



Whychus Portal Environmental Assessment

Decision Notice, Finding of No Significant Impact, and Response to Public Comments



August 1, 2011
Sisters Ranger District, Deschutes National Forest
Deschutes County, Oregon

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Decision Notice & Finding of No Significant Impact

Whychus Portal Project

USDA Forest Service

Sisters Ranger District, Deschutes National Forest

Deschutes County, Oregon

T 15S R09E sec 25,26,35,36, T15S R10E sec 19,20,28,29,30,31,32,

T16 R09E sec 1,2 3,4 10,11,12 W.M.

Introduction

Background

Wild rivers are one of our nation's greatest treasures. Congress recognized this in 1968 when they passed the Wild and Scenic Rivers Act (P.L. 90-542) and established a nationwide system of outstanding free-flowing rivers. These rivers are protected for the benefit and enjoyment of present and future generations. The upper reaches of Whychus Creek and its wilderness tributaries were designated by Congress as a Wild and Scenic River as part of the Omnibus Oregon Wild and Scenic Rivers Act of 1988.

Whychus Creek (formerly Squaw Creek) is located in Central Oregon on the eastern slopes of the Cascade Mountains. It is a perennial stream that is a tributary of the Deschutes River. It is approximately 41 miles long from its headwaters in the Three Sisters Wilderness to its confluence with the Deschutes River. The designated area includes 15.4 miles of the creek, beginning at its source and ending at the hydrological gauging station that is approximately 4 miles southwest of the City of Sisters in Central Oregon. The 6.6 mile segment of the creek from its source to the Three Sisters Wilderness boundary is classified as "Wild". The 8.8 mile segment from the Three Sisters Wilderness boundary to the USGS hydrological gauging station is classified as "Scenic."

The sources of Whychus Creek included in the Wild and Scenic River designation begin on the glaciers of the Three Sisters mountains and include Soap Creek, the South and North Forks of Whychus Creek, and Park Creek, including the East and West Forks of Park Creek.

The 2007 Whychus Creek Wild and Scenic River Resource Assessment found that certain aspects of Whychus Creek are unique on a Regional or National scale. The diverse geology born from volcanoes and glaciers displays water polished basalts, caves, cliffs along remote steep canyons, and channel-filling boulders. The complexity of the creek's channels, including an abundance of waterfalls, wetlands, and a glacier moraine lake as part of the headwaters makes the hydrology of the creek another unique feature. Whychus Creek is poised to regain its importance as the most significant tributary in the Upper Deschutes basin for the reintroduction of threatened Mid-Columbia steelhead. It also sustains a native strain of Interior Columbia Basin redband trout which shows little genetic influence from hatchery fish. The glacial headwaters of Whychus Creek on the Three Sisters mountains are a symbol of Central Oregon and the wild unmodified scenery within the corridor will become more valuable as a refuge for people as the years pass. Its long history of use by Native Americans as a travel corridor to and from the obsidian sources in the High Cascades provides a window into the past. The traditional Native American use of the creek gave it several of its historic names and it remains closely connected to Native American Tribes today though ceded lands and treaty rights.

For these reasons Geology, Hydrology, Fish, Scenic Resources, Prehistory and Traditional Use were found to be the Outstandingly Remarkable Values of Whychus Creek that we are required to protect or enhance for present and future generations. Other river related values such as Wildlife, Ecology/Botany, Cultural History and Recreation were found to be significant and also need some additional protection and management.

We have called Whychus Creek “The Lost River Whychus”. With European settlement the creek lost its historic name, and in its lower reaches, it lost its water and its fish. Many people forgot about it. But now with a concerted restoration effort by many groups, the creek is making a remarkable comeback.

Whychus Creek is no longer a local’s secret. The lower end of the Wild and Scenic River corridor is only 4 miles from the city of Sisters, and its hidden waterfalls, sculpted rock, and ancient travel ways have been discovered by many people; some are responsible users and others are not. The upper reaches of the creek in the Three Sisters Wilderness are receiving high levels of use. Years of unmanaged access have damaged Whychus Creek’s Outstandingly Remarkable Values.

Purpose and Need for Action

This is the first project to begin implementing on-the-ground actions to address the management priorities identified in the Whychus Creek Wild and Scenic River Management Plan (USFS 2010). These actions are needed to restore impacted areas and reduce activities which are harming Whychus Creek’s Outstandingly Remarkable Values (Geology, Hydrology, Fish, Scenic Resources, Prehistory and Traditional Use) now and into the future. The Significant Values of Wildlife, Ecology/Botany, Cultural History and Recreation also need to be better protected and enhanced.

Implementation Priorities/Immediate Actions for the lower Scenic River terminus, are found on pg 60 of the Whychus Creek Wild and Scenic River Management Plan, and are guided by the Deschutes National Forest Land and Resource Management Plan as amended:

- Restoration of habitat (RP-5, RP-36, RP-37, M17-4)
- Controlling use, closing user trails and roads (WL-53, WWSR-H-2, WWSR-H-3, WWSR-H-4, WWSR-S-2, WWSR-W-1)
- Developing a well designed and maintained trail system with defined parking (WWSR-H-3, WWSR-R-2,)
- Identifying, and closing or decommissioning unneeded roads (WWSR-H-2, WWSR-W-30).

The Sisters Ranger District proposes to protect and enhance Whychus Creek’s Outstandingly Remarkable Values by restoring impacted areas and managing access and recreational use of the lower 3 miles of the 8.8 mile “Scenic” segment as directed by the Whychus Creek Wild and Scenic River Management Plan.

The purpose of the Whychus Portal Project is to comply with the Deschutes National Forest Land and Resource Management Plan (USFS 1990) as amended by the Whychus Creek Wild and Scenic River Management Plan (USFS 2010).



Whychus Creek Wild and Scenic River

The Wild and Scenic River Management Plan outlined a strategy for a gradient of management controls and facilities in the Whychus Creek Wild and Scenic River corridor. The strategy proposed more controls and facilities close to the City of Sisters to manage recreational access and use while more remote reaches of the creek, with less use and closer to the wilderness, would provide relatively fewer facilities and controls. The plan allowed development of limited improvements (parking areas, system trails, viewpoint, restrooms) in the Whychus Portal project area to manage use to protect river values and provide interpretive and stewardship education for the growing numbers of visitors.

Reducing and managing access points to the river corridor would allow low impact enjoyment of the area while improving resource conditions. Managed trails are an important technique for reducing pedestrian impacts because they channel and direct foot traffic over a designated route and can be designed to minimize impacts to the creek and avoid sensitive areas.

More and more people have discovered Whychus Creek and increasing use is expected in the coming decades as Sisters and Central Oregon grow. Some portions of the Whychus Creek Wild Section in the wilderness are receiving more use than is recommended by wilderness standards for maintaining their primitive and pristine character (see this document, Appendix 3, pg 54).

We must change the damaging trend that years of increasing unmanaged use in the area has created, resulting in many user created roads and trails, devegetated camping sites, vandalism, graffiti, garbage dumping, illegal residences, illegal trail building and tree cutting, and damage to old growth trees and cultural resources (EA, pg 29,30). The project area has few “system trails” (official managed Forest Service trails) and the trails and roads created by users are often in poor locations. Attempts to block access to sensitive areas are frequently breeched and vandalism is common. The desired semi-primitive character of the Scenic river corridor would be enhanced by reducing access points, reducing motorized access, moving bike use off streamside trails, restoring user trails, reducing and restoring dispersed camping sites, and changing user groups to emphasize low impact recreation (EA, pg 67).

Water quality, fish habitat, Scenic Resources, impacts to cultural resources, and wildlife habitat would be improved by limiting motorized access and by closure and revegetation of user trails, dispersed camping sites, and unneeded roads (EA, pg 62-67). A managed trail would be designed to protect river resources while improving visitor safety and recreational experience.

There is also an important opportunity to build stewardship for the areas’ future by allowing people to learn about the rivers’ Outstandingly Remarkable Values and developing community and youth awareness and engagement. The Whychus Creek watershed is already a focus of strong partnerships between non-profit, conservation, industry, and community groups. Hiking, biking and climbing groups are active partners in management under volunteer agreements and formal partnerships.

Alternatives Considered (EA, pg 41-51): Three alternatives were analyzed in detail: No action (Alternative 1), the Proposed Action (Alternative 2) and Alternative 3. Three additional alternatives (Alternative 4, 5, and 3 Modified) were considered but not analyzed fully because they were evaluated as not consistent with the Whychus Creek Wild and Scenic River Management Plan (EA, pg 51-56).

Summary of Decision and Rationale

Based on my careful review of the Project Purpose and Need, Interdisciplinary Team analysis, and the public comments I received throughout the project, I have decided to implement Alternative 2 with some modifications that I will discuss below. Alternative 2 has been changed in response to public comments. I believe that Alternative 2, as I have modified it, best meets the purpose and need of the project (EA, pg 28). *My modifications are shown in italics below.*

I have heard overwhelming support from the public that something needs to be done to protect this lower segment of the Scenic Section of Whychus Creek Wild and Scenic River. However, several people have also strongly expressed their concerns to me that putting in designated trails, parking areas, and signs would change the areas character and bring too many people. I have carefully considered the question of how to manage the increasing use throughout the entire Whychus Creek Wild and Scenic River Boundary without changing the areas special character. I believe more people will come to Whychus Creek no matter what we do, and we must be prepared and manage this use to fulfill our obligations as river stewards.

The Whychus Creek Wild and Scenic River Management Plan specified that areas near and within the Wilderness would be managed for more primitive character as part of the strategy of a gradient of management controls and facilities, described on page 5 of this document and in the EA (pg 162, 164). I am concerned about the high level of use in the Wild Section of Whychus Creek Wild and Scenic River in the Three Sisters Wilderness and believe the project area in the lower Scenic Section of the Creek is the best location to provide some managed trail opportunities as the management plan designated. This may reduce pressure on the higher reaches of the creek by providing a similar type of recreational experience closer to the city.

I believe Alternative 2 Modified will reduce or eliminate much of the damaging activities that are occurring, initiate significant restoration and recovery of riparian areas, help reduce pressure on the Wild Section of the creek, and provide a low impact recreation opportunity where it is most needed to build stewardship and a constituency for this important river.

The goal of Alternative 2 Modified is to protect and enhance the creeks Outstandingly Remarkable Values by managing access with road closures, defined parking areas, and restoration of impacted areas to maximize the effectiveness of Riparian Habitat Conservation Areas and protect wildlife habitat. A modest trail system would be designed to lead people away from some sensitive cultural resource areas and streamside habitats, but provide scenic views and enough length to allow most people to enjoy the area from the system trail. User trails which develop would be monitored and closed as needed.

Alternative 2 Modified addresses the priority management needs identified by the Whychus Creek Wild and Scenic River Management Plan and complies with the plans Standards and Guidelines as well as with other applicable plans. My conclusions are based on a review of the record that shows a thorough analysis of the relevant scientific information, as well as the acknowledgement of incomplete or unavailable literature.

Some features of Alternative 2 Modified include:

- **Reducing and managing access points to the river corridor** – The project would reduce and manage vehicle and hiking access points to the creek on both east and west sides to increase habitat effectiveness, speed vegetation recovery, and reduce impacts and vandalism.
- **Restoration of User Created Trails** - Recontouring and revegetating 3.9 miles of user-created trails in the Whychus Wild and Scenic River corridor would restore habitat and reduce erosion.
- **Closure or decommissioning of unneeded system roads to improve habitat effectiveness and reduce erosion-** A total of 13 National Forest System roads or road segments would be closed totaling 4.1 miles, and 10 National Forest System roads or road segments totaling 6.2 miles would be decommissioned and restored with native plants. Of these totals, 0.5 miles of Rd 900 would be converted to the Metolius/Windigo Trail and 2.1 miles of Rd 440/464 road would be closed or decommissioned and converted to a mountain bike trail. Another 1.1 miles of user created roads would be decommissioned and restored.
 - *I have modified Alternative 2 to include the re-closure of a user created road between Rd 700 and Rd 520 on the west side of the creek. This breach is within the Wild and Scenic River Boundary, and has been created on a section of the Three Creeks Road-Metolius Windigo Connector trail, which is a part of the Sisters Community Trails system.*
- **Restoration and closure of Dispersed Camping Sites-** 10 dispersed campsites on the east side of the creek would be closed and restored to reduce impacts to streamside areas and reduce vandalism. No dispersed camping would be allowed, except at Rd 900.
- **Protection for Whychus House Cave.** This cultural site has been repeatedly damaged by vandalism and graffiti and will be better protected by routing the hiking trail around and past the area to avoid the cave.
- **Restoration of the Walk-in Camping Area at the End of Rd 900** – The devegetated camping area would reduced in size (to 1-3 designated sites) and restored to protect a prehistoric site, reduce vandalism, and reduce erosion. Soil restoration would be done with hand tools to avoid damage to the prehistoric site.
 - *I have modified Alternative 2 to facilitate the restoration and implement a temporary closure of the area to camping for 2-3 years to speed vegetation recovery.*
- **Parking Control, Day Use, and Improved Monitoring of Vehicles-** Parking areas would be reduced and moved to more visible sites to facilitate monitoring and enforcement. Parking areas would be primitive, confined with boulders with a gravel surface. Small parking areas at Rd 370 and 442 would allow Day Use Only. The parking area on Rd 880/900 would eventually allow overnight use to the walk-in campsites after revegetation of the area has been successful.
- **Hiking Trails:**
 - **River Trail-** A 2.8 mile river trail would provide foot access from below the Wild and Scenic River corridor at Rd 370/gauging station area to Rd 900 to manage access in the lower river and protect river resources with a connection back to the canyon top.
 - *I have modified Alternative 2 to make the river trail a Class 2 Trail, which is more primitive than most trails on the Forest. Its attributes include: narrow single lane tread, with obstacles common and intended to provide increased challenge, blockages cleared to protect resources, and minimal signing.*
 - **Canyon Top Loop-**A 1.1 mile loop trail on top of the canyon to a viewpoint (the overlook) would be fully accessible (meet ADA Standards).

- The canyon top loop trail would be a Class 4 Trail, which is more developed than most on the Forest to allow access to individuals with limited mobility. Its attributes include: a wide and smooth trail tread, which may be hardened where needed, with few insubstantial obstacles, and signing to help build awareness of low impact practices and stewardship opportunities.
 - These trails combine to create a total 3.9 miles of trail; 2.8 miles would be new trail, and 1.1 miles would be improved user-created trails.
- **Bike Connections-** Mountain bikes currently use old roads within the project area to connect from the Peterson Ridge Mountain Bike Trail to the Metolius/Windigo trail. A 2.9 mile connection would be maintained on open, closed, or decommissioned roads. A small section (0.75 miles) of new single track trail would skirt around a section corner of private land on the existing road and utilize “roads to trails” engineering techniques within 50 feet of the centerline of road from the intersection with Rd 1600450 to the evaluation plantation, to improve the experience on the bike trail while using part of the existing road bed. An additional 2.2 miles of road would be decommissioned to trail.
- **Equestrian Connections-** Equestrian trails within the project area would be maintained along the Three Creeks Road- Metolius/Windigo Connector Trail on the north side of the river and the Metolius/Windigo trail. A ½ mile segment of the Metolius/Windigo trail which runs on Rd 900 would be decommissioned and converted to a trail for both equestrians and mountain bikers while eliminating vehicle use and water runoff to the creek.
- **Climber Spur Trails-** There are rock climbers that use the area and 2 small trail spurs will be maintained to continue to provide access and prevent the development of new user trails.
- **Scenic Overlook-** Linked to the 1.1 mile accessible loop trail on top of the canyon, an enclosed area would be constructed of mostly native materials to allow people to safely enjoy the spectacular views near the cliffs off Road 442. One restroom would be located at the parking area.
 - *I note that there was a 0.6 acre human caused wildfire adjacent to the user trails in the proposed overlook area on July 11, 2011. I have consulted with the Interdisciplinary Team and this did not result in a change in condition that would change the Environmental Analysis. However, the Rd 442 area has been the site of repeated resource damage and dumping. I have initiated an administrative closure of Rd 442 to help protect the Wild and Scenic River corridor from further damage until a plan is in place.*
- **Stewardship Education and Sustainability-** The parking area or trails leading to the overlook area would be a place to explain the Wild and Scenic River and its Outstandingly Remarkable Values, community stewardship philosophy, and the low impact behaviors required to protect the river corridor. The Forest Service will continue to work closely with the Tribes, state and local governments, partner organizations, and the public to encourage community stewardship and volunteerism.
- **Controlling Use and addressing Carrying Capacity-** The project would comply with the guidance of the Recreational Opportunity Spectrum characterizations of the Whyhous Creek Wild and Scenic River Plan which defined appropriate levels of access, remoteness, naturalness, facilities and site management, social encounters, and visitor management.
- ***I have modified Alternative 2 to implement an integrated suite of direct and indirect management practices that include:***
 - a) signs that encourage hikers to stay on maintained trails,*
 - b) monitoring and closure of developing user trails as needed,*

- c) unobtrusive fencing along the margins of trails where needed,*
- d) design of the river trail as a narrow Level 2 trail to provide more challenge and obstacles*
- e) an aggressive information/education program to inform visitors on low impact behaviors.*
- f) clarification that all of the area except, the Rd 900 campsite would be restricted to “day use only” to prevent vandalism and prevent the development of new dispersed camping areas.*

Rationale for my Decision and Response to Issues

Protecting and Enhancing the Outstanding Remarkable Values of Whychus Creek Wild and Scenic River

The Decision will protect and enhance the Outstandingly Remarkable Geology, Hydrology, Fish, Scenic Resources , Prehistory and Traditional Use of Whychus Creek.

Geology- The landscape of Whychus Creek is defined by the diverse and scenic geological features of steep canyons and cliffs, caves, water polished potholes, and rock spires. With recreational rock climbing still at low levels but increasing in the project area, it is imperative we develop a constituency that will help us protect scenic values and integrity of geological features and self-police the standards of the Whychus Creek Wild and Scenic River Management Plan for “Leave No Trace” rock climbing. Closing and restoring dispersed camping sites near some climbing areas will lessen the footprint of use near the creek while allowing people to enjoy this activity.

I have been impressed with the stewardship initiative of climbers from the non-profit group, Central Oregon Rocks, INC., who have assisted us by sharing information with climbers about the new “Leave No Trace” standards and by showing us where the climbing areas are in the Whychus Portal area. By leaving access spur trails for climbers, working with climbers to monitor impacts carefully, and growing our partnership with Central Oregon Rocks, INC and the rock climbing community, I believe we can protect and enhance the Outstandingly Remarkable Geology of Whychus Creek while allowing people to continue to enjoy rock climbing in the corridor under the new Standards and Guidelines of the Whychus Creek Wild and Scenic River Management Plan (EA, pg 77).

Hydrology- The cold waters of Whychus Creek originate on glaciers of the Three Sisters Mountains and are the cornerstone of the area’s ecology, providing habitat for thriving populations of plants, animals, and fish. I am committed to protecting and restoring streamside vegetation and reducing erosion to protect the water quality of Whychus Creek.

I am concerned that the current minimal management of dispersed recreation including the proliferation of user trails, high road densities, sprawl of dispersed campsites, and minimal monitoring would not move conditions toward the desired condition quickly enough if I chose Alternative 1 (EA, pg 88). I am also concerned that the minimal trail development under Alternative 3 will lead to a proliferation of user trails from trail endpoints (EA, pg 91).

The trampling of stream banks and riparian vegetation makes the banks more susceptible to erosion and adds sediment into the creek. Restoring dispersed camping areas, removing or converting user-created trails into a managed trail system, relocating trails, closing user created roads and trails, and limiting the access to most riverside trails to foot traffic only will address these concerns and will allow riparian areas to recover and function more effectively during Whychus Creeks frequent winter flood events (EA, pg 88-90). Reducing trail erosion near Whychus Creek and other hydrologically

connected areas will reduce bank instability and sedimentation to Whychus Creek (EA, pg 88-90). There are beneficial cumulative effects to the creeks hydrology predicted by the results of this project in combination with new travel management regulations and other ongoing restoration activities in the watershed (EA, pg 92).

The modifications I have made in response to public comments, such as a more narrow and primitive river trail, the additional closure of a user road on the west side of the creek, and the implementation of an integrated suite of direct and indirect management practices to minimize user trails and unmanaged use will help ensure Whychus Creek has stable streambanks and protect its clean cold water.

By implementing programmed monitoring (EA, pg 60) and providing educational opportunities about the unique hydrology and the need for low impact behaviors I believe Alternative 2 Modified will help protect the Outstandingly Remarkable Hydrology of Whychus Creek while allowing people to continue to enjoy this beautiful creek.

Fish - As Whychus Creek regains its important role in the life cycle of mid-Columbia steelhead returning to this mountain stream from the sea to spawn, I emphasize my determination to insure sustainable fish habitat. My goal is to see wild steelhead and redband trout migrate freely along Whychus Creek as they once did, and that the natural processes continue which sustain and protect the habitat of the Outstandingly Remarkable Fish of Whychus Creek.

I did not choose Alternative 1 or Alternative 3 for the same reasons as I discussed above in the Hydrology Section (also see EA, pg 103, 104). They do not improve conditions quickly enough and are likely to lead to continued development of user created trails. I believe the actions I have decided to implement, and have described above in the discussion on Hydrology, will protect and enhance both Hydrology and Fish and move conditions more rapidly toward our goals for the benefit of the wild fish of Whychus Creek. Protection of stream banks and riparian vegetation are the focus of my direction for recreation management and restoration work. There are beneficial cumulative effects to fish predicted by the results of this project combined with new travel management regulations and other ongoing restoration activities in the watershed (EA, pg 104,105). The modifications I discussed above will also help ensure Whychus Creek provides the clean cold water that fish need.

Scenic Resources - I believe that people that have experienced the wild, relatively unmodified scenery of Whychus Creek recognize the value of this unusual landscape. The rich variety of scenic experiences from distant views of the headwaters of Whychus Creek on the glaciers on the Three Sisters mountains to close views of waterfalls, quiet pools, riparian shrubs, flowers, and old growth trees provide a backdrop for people to relax in the beauty of a largely undisturbed natural environment.

Accordingly, I have chosen Alternative 2 Modified to maintain or improve the scenery so that it remains essentially like it is today, if not better; the only changes being to improve or remove discordant elements where needed by restoration and continued monitoring and cleanup (EA, pg, 110).

I am concerned that the current minimal management of dispersed recreation affects scenic quality due to impacts from unregulated camping, dispersed use, and illegal behaviors and this may increase with population growth in the future. Alternative 1 does not provide sufficient guidance to make the changes needed to protect and enhance the remarkable Scenic Resources of Whychus Creek (EA, pg 109). I am also concerned that the minimal trail development under Alternative 3 will lead to a proliferation of user trails from trail endpoints and that this unmanaged use would continue to degrade scenic quality (EA, pg 111).

I have decided to include actions to help manage recreational use today and in the future to protect the Outstandingly Remarkable Scenic Resources. As recreational use increases in the corridor, a need for subtle but effective management controls (such as parking areas, areas closed to vehicle access, signs, and designated trails) will also increase. By providing a fully accessible overlook, people would be able to enjoy some of the most significant vistas, the glaciers on the mountain peaks of the Three Sisters Mountains, while staying far from the creek (EA, pg 108.) There are also beneficial cumulative effects predicted to scenic resources from these increased management controls and reductions in road densities, along with new travel management regulations and other planned streamside and forest restoration projects (EA, pg 111).

The existing Deschutes National Forest Land and Resource Management Plan Visual Quality Objectives of “Retention” would continue to require a high degree of sensitivity and mitigation in any activity that affects the natural appearance of the area. The transition to the Scenery Management System is defined in the Whychus Creek Wild and Scenic River Management Plan by standards that include fire and human interaction as part of the landscape ecosystem. In this decision I am supporting the concept outlined in the Whychus Creek Wild and Scenic River Management Plan (EA, pg 107) that the fire ecology of the forest is a part of the view by approving the construction of a trail connection through the Rooster Rock Fire Area and the recent small wildfire near the canyon top cliffs. People can expect to see distant vistas and close views with signs of fire which is important to the forest, wildlife, and native plants of the area. These recent fires provide an opportunity for people to watch the forest recover and see a succession of colors and textures of the plant species in this fire evolved forest system.

Monitoring will better track visually detracting elements (EA, pg 60, and Whychus Creek Wild and Scenic River Management Plan, pg 65). The few facilities needed for the purpose of protecting river values will be rustic in character and designed to complement the natural surroundings.

Cultural Prehistory and Traditional Use - I recognize the non-renewable and generally fragile nature of prehistoric resources. The design of Alternative 2 Modified will reduce impacts to cultural resources of Whychus Creek and emphasize what they can teach about the way people here lived in the past. I am determined to better protect Whychus House Cave, an important cultural site, from the relentless vandalism which has occurred there for years. In addition to the closure of the cave to camping, campfires, and rock climbing that was implemented under the Whychus Creek Wild and Scenic River Management Plan decision, I believe the design of the trails in Alternative 2 Modified will provide the best protection for the cave by moving people past it to other desirable locations upstream (EA, pg 116-117). I am particularly concerned that Alternative 3 would lead people to an area above Whychus House Cave and end, leading to more self exploration and user created routes and resource damage in the cave area (EA, pg 118). If monitoring shows that the trail design and other measures of Alternative 2 Modified are not sufficiently effective, I will implement additional protective measures.

The Confederated Tribes of Warm Springs, Oregon have declared their interest in treaty protected resources of the creek including wildlife, anadromous fish, hydrology, prehistoric sites, and cultural significance (EA, pg 32). I did not choose Alternative 1 or Alternative 3 for the same reasons as I discussed above in the Hydrology Section. They did not improve conditions quickly enough and could lead to continued development of many user trails and associated threats to the Outstandingly Remarkable Values.

During the 30 day public comment period a member of the public raised concerns about the effects of the project on deer as a protected treaty resource. I have spent extra time investigating the effects of the project on deer and consulting on this issue with our designated representative from the Confederated Tribes of Warm Springs (this document, Appendix 2, pg 49). I believe that Alternative 2 Modified will better protect deer and their habitat through road closures, reducing dispersed camping, and establishing day use only in most areas which will allow deer undisturbed access to the creek in the evenings (EA, pg 150-151, and this document, Appendix 2, pg 46-47).

This decision will not affect the viability of the deer population in the project area, on the Deschutes National Forest or in the Tumalo Winter Range (Appendix 2 of this document, and Whychus Portal Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011).

There are beneficial cumulative effects to Prehistoric and Treaty Resources from the avoidance of sites during planning, reducing unmanaged use, reducing erosion, and other projects occurring in the watershed which restore the stream function, control invasive plants, and manage forests to reduce the risk of losing treaty resources to wildfires (EA, 118-120).

Protecting and Enhancing the Significant Values of Whychus Creek Wild and Scenic River

The Decision will protect and enhance the Significant Values of Wildlife, Cultural History, and Vegetation and Ecology of Whychus Creek.

Wildlife- By selecting Alternative 2 Modified, I am implementing new measures from the Whychus Creek Wild and Scenic River Management Plan that provide special consideration for the Significant Wildlife found in the Whychus Creek Wild and Scenic River corridor. The actions discussed above which manage recreational access and restore streamside areas will also enhance wildlife refugia and reduce disturbance (EA, summary pg 64-66). I recognize that there are many more roads in the corridor than needed for administrative and public access and we must work to reduce road densities (EA, pg 150). By closing these unneeded roads we are creating blocks of wildlife habitat with far less disturbance. Revegetation of reclaimed roads will also accelerate habitat recovery providing additional useable habitat. I clarify here that there may be some minor short-term displacement of deer, as discussed in Appendix 2, pg. 48, however this decision will not affect the viability of the deer population in the project area, on the Deschutes National Forest or in the Tumalo Winter Range (Appendix 2 of this document, and Whychus Portal Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011).

Alternative 2 Modified which limits visitors to day use only in most areas will allow many wildlife species undisturbed access to the creek in the evenings. Combined with other travel management actions in the area the project is expected to cumulatively benefit the mule deer population by reducing motorized roads, non-motorized trails user created trails, and cross country travel.

I did not choose Alternative 1 because the current levels of unmanaged use, user created trails, and vandalism are damaging wildlife habitat and creating excessive disturbance in sensitive streamside Riparian Habitat Conservation Areas (EA, pg 131,132,134,143,147, 150). I am also concerned that the minimal trail development under Alternative 3 is a less proactive approach to managing increasing human use and will lead to a proliferation of user trails from trail endpoints and cause more damage to nearby wildlife refugia (EA, pg 133,134,145,148,152).

Ecology/Botany - In selecting Alternative 2 Modified, I am protecting and restoring riparian and streamside vegetation by reducing damaging access which will aid in the recovery of these important diverse areas. Vegetation restoration activities are expected to have the highest chance of success under Alternative 2 Modified (EA, pg 160). I did not chose Alternative 1 because of its impacts to riparian habitats, risks of weed introduction, and risks to the sensitive plant Peck's penstemon. I am concerned that Alternative 3 will not provide enough managed access to prevent impacts to areas we are trying to restore (EA, pg 160). There are predicted beneficial cumulative effects to botanical resources from increased management controls and reductions in road densities, along with other streamside and forest restoration projects in the watershed including continued management of invasive plants (noxious weeds) (EA, pg 161).

Cultural History – No known Cultural History sites are known to occur in the project area, but by implementing Alternative 2 Modified I have created an opportunity to interpret the long history of irrigation water use in the watershed and discuss how changes being made today are restoring water and fish. The river trail would begin outside the Wild and Scenic River corridor off Rd 370 and travel through an abandoned ditch and across an old irrigation control structure. This is an opportunity to shed light on this long and rich cultural history of natural resource use and changing societal values.

Ensuring an Appropriate Level of Recreation Development

The Decision will follow the strategy of the Whychus Creek Wild and Scenic River Management Plan by implementing more management controls in the project area in the lower Scenic Section and protect and enhance the Significant Recreation value of Whychus Creek while protecting and enhancing its Outstandingly Remarkable Values.

Recreation - The question of how best to protect the significant Recreation Resources of Whychus Creek has required thoughtful consideration because what is unique about the creek is its undeveloped nature and relatively low use. How do we prevent a place from being loved to death, over promoted, or over developed so the very thing that makes it unique is lost?

I believe that the strategy of a gradient of managed access and management controls developed in the Whychus Creek Wild and Scenic River Management Plan to address recreational development was carefully crafted and is the best solution in managing use and developing support for the stewardship of this Wild and Scenic River now and in the future. By providing a modest number of trails, a viewpoint, a restroom, interpretive information, and carefully managing access near the city of Sisters we can best ensure that: 1) the Outstandingly Remarkable Resources in the lower corridor are protected and enhanced, 2) that the wilder more inaccessible sections of the upper Scenic Section of the creek will remain available for self discovery, and 3) that the pressure on the Wild sections of the creek can potentially be reduced.

Our analysis found that along with the reasonably foreseeable implementation of the Deschutes and Ochoco Travel Management Plan, the overwhelming cumulative trend in the Whychus Creek Watershed is the change in the variety of available recreational experiences from unmanaged motorized recreation opportunities to an emphasis on more managed low impact, non-motorized recreation (this document, Appendix 3, pg 51). With the upcoming implementation of the changes to public access, there would be less motorized access by vehicles and off-road vehicles and more managed hiking, biking, and equestrian trails. However, the majority of the Scenic River Corridor (5.8 out of 8.8 miles) will remain unchanged and available for self discovery and more primitive recreation experiences.

We expect a cumulative increase in managed, or more regulated, low impact recreation use in the lower portion of the Whychus watershed near the city of Sisters and the bottom 3 miles of the Whychus Creek Wild and Scenic River Scenic section. This is accompanied by the benefits of potentially reducing pressure on the Whychus Creek Wild and Scenic River Wild section and the Three Sisters Wilderness where use levels and resource impacts are also a concern.

My objectives are to maintain a “semi-primitive” environment in the Scenic Section where people can expect to see a few other visitors along the more challenging river trail, have a moderate degree of challenge and risk moving through the landscape and a largely undisturbed natural setting. I believe the loop trail on the top of the canyon will draw the most use, but keep people far from the creek. It would be a one way loop trail to reduce encounters while creating a short, fully accessible hike to one of the most spectacular views in Central Oregon. I intend to keep signs to a minimum in the project area, however at the parking area to the overlook I intend to install signs which fulfill Management Plan direction to provide interpretive and stewardship information that will educate users about the Wild and Scenic River, the philosophy of management, and low impact practices.

I believe that by providing these opportunities on the lower 3 miles of the 8.8 mile Scenic River corridor near the city of Sisters we will be able to better protect the remaining 5.8 miles of the Scenic corridor and the entire Wild River corridor. My objectives are to maintain an undeveloped “semi-primitive” environment in the remaining 5.8 miles of the Scenic Section and a “primitive” environment in the Wild section where people can experience the highest sense of remoteness, quiet, self-reliance, and isolation.

I did not select the No Action Alternative 1 because throughout the planning process people have been remarkably consistent in wanting to see more management of Whychus Creek because of the damage caused by an unmanaged proliferation of user trails, illegal trails, some damaging use and vandalism (EA, pg 166-167, 170). However, there is still a spectrum of opinions on what should be done, ranging from managing the creek for minimal public access and keeping it off maps to increasing access for a variety of user groups. I have carefully weighed concerns, the advice of the Interdisciplinary Team, and reviewed the effects analysis. I believe the strategies and priorities I am following from the Whychus Creek Wild and Scenic River Management Plan are the best way to protect the Outstandingly Remarkable Values while providing managed access for the public’s enjoyment and responsible use. I am also committed to promoting awareness of the Outstandingly Remarkable Values and importance of community stewardship of this amazing place.

I will discuss why I did not select Alternative 3 or some suggested modifications to Alternative 3 in the section below.

In response to public concerns that the Proposed Action included too much recreational development I directed the Team to create and fully analyze Alternative 3, which featured less trail development and created two, short, one way hiking trails, rather than loops or longer continuous trails. I did not select Alternative 3 because I felt it did not provide adequate controls for hiking and left people standing in attractive areas where they were very likely to continue to explore. I did not feel the length of the 1.1 mile river trail was adequate to occupy most hikers and user trail development and associated resource damage would continue. A one way (out and back) trail at the viewpoint was likely to create a sense of more crowding since people would be have more encounters with each other coming and going than on a one way loop.

A variety of modifications to Alternative 3 were suggested during the 30 Day Public Comment Period by one individual and I directed the team to develop and analyze a viable “Alternative 3 Modified”. Suggested modifications included ending the trail above Whychus House Cave and looping it back on

an old road, or leaving user trails unmapped and unmanaged. The details of this proposal, a map, and our analysis are found in this document in Appendix 2, “Response to Public Comments” on page 34-37.

After additional field work, trail layout, mapping, and many discussions with the Project Team I agreed with them that this option was unlikely to adequately protect the Outstandingly Remarkable and Significant Values and would likely be harmful to river values.

In brief, I directed the team to create a viable modification of Alternative 3 by locating topographic barriers that would control public access and reduce the risk of continued user created trails up and down the creek. These points were located and exactly match the existing user trails mapped in the Environmental Assessment (EA, pg 40). If we were to build these trails there would be 2 trails that end within a 1/4 mile of each other and the viewpoint parking area would be less than 1/4 mile from the end of these two trails. The southern endpoint of the trail would be at a topographic barrier (steep rocks and manzanita field) however it is also a narrow and sensitive canyon that is an important wildlife habitat where we don’t want much use. This modification would build more creek-side trail than we believe is needed or appropriate. The Team felt we would have a very hard time keeping people from making their own trails to connect the two trails and viewpoint parking area together. The loop created by using an old roadbed through a second growth forest near Rd 16 was evaluated by trail specialists as an unattractive route that people would be unlikely to follow.

I do not believe that leaving user trails on the landscape unmanaged and unmapped is responsible land management. It implies that these trails are acceptable and benign, and some clearly are not. Without trail maintenance they can become braided and cause increasing damage as routes develop around obstacles and eroded areas. Trail maintenance protects resources and minimizes human impacts on the landscape. I appreciate creative thinking to find solutions, however I do not feel that implementing these suggestions would follow the strategy created in the Whychus Creek Wild and Scenic River Management Plan, or be a solution that protects and enhances the rivers values.

I also do not agree that the area should be kept off maps as a strategy to reduce use. More use will occur in the area, no matter which Alternative is implemented, including if we do nothing (EA, pg 166). Population growth in Sisters and Central Oregon has increased and so have the impacts to this area which is 4 miles from the City of Sisters (EA, pg 29, 30, 166-169). This is why this area was identified as a priority for management action to address damage to the Outstandingly Remarkable and Significant Resources in the Whychus Creek Wild and Scenic River Management Plan.

The Wild and Scenic Rivers Act does not prohibit people from enjoying a Wild and Scenic River. As River managers we are required to protect and enhance the river values for which it was designated while providing for public use and enjoyment which does not adversely impact those values (Wild and Scenic Rivers Act, Public Law 90-542, Section 10.a). I believe it is reasonable to allow public use and enjoyment by putting designated trails on a map which reduces user trail creation because people know where the trail is located. We believe it is critical that we use this opportunity to build awareness, appreciation, and long term stewardship of the area for present and future generations.

My Conclusions

The Decision will Protect and Enhance the Outstandingly Remarkable and Significant Values of Whychus Creek.

With the modifications to Alternative 2 that I have discussed, my decision will meet the purpose and need to comply with the Deschutes National Forest Land and Resource Management Plan (USFS 1990) as amended by the Whychus Creek Wild and Scenic River Management Plan (USFS 2010). The Whychus Creek Wild and Scenic River Management Plan (USFS 2010) identified a need for immediate management actions in the project area to restore impacted areas and reduce activities which are harming Whychus Creek's Outstandingly Remarkable Values (geology, hydrology, Fish, Scenic Resources, prehistoric resources and Native American traditional use) now and into the future. The Significant values of wildlife, vegetation/ecology, cultural history, and recreation also need to be better protected and enhanced.

I believe my decision looks to the future as well as the present and thinks about sustainability. I am implementing these actions to set the management of this Wild and Scenic River on the right path, but we cannot manage this river alone. I am counting on assistance from community stewardship, and the continued involvement of visitors and partners who understand the value of this unique wild place.

This Decision is consistent with the Deschutes National Forest Land and Resource Management Plan as amended by the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures and Guidelines* (2001 ROD, as modified by the 2011 Settlement Agreement.

On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Sherman, et al.*, No. 08-1067-JCC (W.D. Wash.), granting Plaintiffs' motion for partial summary judgment and finding NEPA violations in the *Final Supplemental to the 2004 Supplemental Environmental Impact Statement to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines* (USDA and USDI, June 2007). In response, parties entered into settlement negotiations in April 2010, and the Court filed approval of the resulting Settlement Agreement on July 6, 2011. Projects that are within the range of the northern spotted owl are subject to the survey and management standards and guidelines in the 2001 ROD, as modified by the 2011 Settlement Agreement.

This project contains 88 acres (2% of the project area) that are managed under the Northwest Forest Plan (EA, pg 19). I have reviewed the NEPA document for the Whychus Portal Project and have determined it is consistent with the Deschutes National Forest Land and Resource Management Plan as amended by the 2001 *Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures and Guidelines* (2001 ROD, as modified by the 2011 Settlement Agreement.

This Decision will not adversely affect Threatened, Endangered, and Sensitive Wildlife, Fish or Botanical Species.

I have considered the effect of my decision on Threatened, Endangered, and Sensitive Species (TES) related to the Endangered Species Act through Biological Assessments and Evaluations completed by the Project Team. Based on the analysis presented in the EA (EA, pgs 97-106,121-153, 154-161) and the project record, I have concluded that Alternative 2 Modified will not have an adverse impact to wildlife, fish, or plant species of concern, including Management Indicator Species (MIS) outlined in the Deschutes National Forest Land and Resource Management Plan.

My decision is consistent with the Deschutes National Forest Land and Resource Management Plan and the Project Design Criteria Compliance Checklist for the Joint Aquatic and Terrestrial Programmatic Biological Assessment for Federal Lands in the Deschutes Basin.

Summary of Effects to Wildlife and Plant Species

Species	Status	Effect
Northern Spotted Owl	Federally Threatened	No Effect
Whiteheaded Woodpecker	Region Six Sensitive Species	No Impact
Lewis' Woodpecker	Region Six Sensitive Species	No Impact
Pacific Fisher	Region Six Sensitive Species	No Impact
Johnsons Hairstreak	Region Six Sensitive Species	No Impact
Crater Lake Tight Coil	Region Six Sensitive Species	No Impact
Columbia River Bull Trout	Federally Threatened	No Effect
Interior Redband Trout	Region Six Sensitive Species	No Impact
Mid-Columbia Steelhead Trout	Federally Threatened	No Effect
Chinook Salmon	Magnuson-Stevens Act designated Essential Fish Habitat	No Adverse Effect
Peck's penstemon	Region Six Sensitive Species	No Impact

Source: The Whychus Portal EA (2011), Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011) Aquatic Biological Evaluation for Threatened, Endangered, and Sensitive Species (Dachtler, N. 2010), and the Biological Evaluation for Sensitive Plant Species and Invasive Plant Species (Pajutee, M. 2011). Region 6 Sensitive Species List 2008.

The Decision will follow the Monitoring Program developed in the Whychus Creek Wild and Scenic River Management Plan to detect changes to the Outstandingly Remarkable Values of Whychus Creek.

A Monitoring Program is an important part of my decision (EA, pg 60). By using the Limits of Acceptable Change concept developed in the Whychus Creek Wild and Scenic River Management Plan to evaluate progress toward or achievement of the desired future condition, rather than on how much use an area can tolerate, I believe we can detect changes that could be harmful to Whychus Creek's Outstandingly Remarkable Values before they become a serious problem. This is an area I would like to engage community stewards and volunteers in order to increase our effectiveness.

This Decision Complies with the Forest Plan and other related Planning Documents

In all respects, I find this decision to be consistent with the Deschutes National Forest Land and Resource Management Plan, as amended by other applicable plans, laws, and regulations (EA, 13-26) and with the requirements of the National Forest Management Act.

Alternatives Considered

In addition to the selected alternative, Alternative 2 Modified (as discussed above), I considered two other alternatives in detail (Alternative 1 and 3). A comparison of Alternative 1, 2, and 3 can be found in the EA (pg 61).

I also considered three additional alternatives (Alternative 4, 5 and 3 modified) but did not direct the Interdisciplinary Team to analyze them in detail. These alternatives and my reasoning are discussed below.

Alternative 1 - No Action. (EA, pg 41).

I did not choose this alternative because it does not fully protect and enhance the Outstandingly Remarkable Values of Whychus Creek. Many of the actions I have discussed in detail in this decision reflect where gaps are found in existing direction that I believe must be addressed in our future management.

Alternative 3 (EA, pg 47).

The goal of Alternative 3 was to protect and enhance the creek's Outstandingly Remarkable Values with similar restoration actions, road closures, defined parking areas, while creating a more limited trail system that leads people away from some sensitive cultural resource areas and streamside habitats but provides some scenic views. A minimal trail system would be designed to take hikers to vista points and the area would retain more primitive character. I have discussed my concerns about Alternative 3 and Alternative 3 Modified in depth in the previous sections.

Other Alternatives considered but not analyzed in detail

Alternative 3 modified is discussed above in the Recreation section.

Alternative 4- "Leave it Alone- Restoration Only (EA, pg 52)

One person commented that the Forest Service should consider a "restoration only" approach to maintaining the Wild and Scenic River corridor. The person felt we should close all the roads and user trails into the area, and provide primitive parking areas, but no restrooms or informational signs, keep the area off maps and brochures, and allow all entry into the area to be by "self discovery".

This alternative was considered but not analyzed in detail because it does not meet the Purpose and Need to protect the creek's Outstandingly Remarkable Values, and it is inconsistent with the Whychus Creek Wild and Scenic River Management Plan. Providing no control of foot access into the area would re-create the situation we are currently trying to address, with each person making their own trail and trampling forest and streamside vegetation creating eroding areas. The effects of this type of access would create a constant need for user created trail obliterations and a low rate of restoration success as people explore their own way to the creek. Not all roads into the area can be closed because some are needed for fire management and other administrative access.

Maintaining "Self discovery" is a goal of the Whychus Creek Wild and Scenic River Management Plan. According to the management plan, recreation managers believe this can be most successful in

more remote areas of the upper scenic river corridor, not areas close to urban developments. The majority of the less sensitive uplands of the project area would also remain available for self discovery. Long term stewardship of the area, as cultivated by educated visitors is also an important goal of the Management Plan. Remaining silent on river values and low impact behaviors, and attempting to hide this recognized nationally important river would not fulfill our management responsibility to the river and the present and future generations for who it was protected.

Alternative 5- More Development and Improved Access and Recreation Experience (EA, pg 53)

A fifth alternative was proposed during scoping with the idea of allowing access and recreational developments including a trail bridge over Whychus Creek, a new single track mountain bike trail into the canyon, larger parking areas and more links to trails downstream (EA, pg 53). This alternative was considered but not analyzed in detail because it does not meet Purpose and Need to protect the creek's Outstandingly Remarkable Values and it is inconsistent with the Whychus Creek Wild and Scenic River Management Plan. Implementing these actions is likely to have detrimental impacts to riparian areas, wildlife refugia, the desired primitive and semi-primitive character, the desired carrying capacity and the desired social setting (EA, pg 55-56). I emphasize that Recreation is a Significant Value but was not rated as an Outstandingly Remarkable Value and protection and enhancement of the Outstandingly Remarkable Values must take precedence.

Public Involvement

There has been a lot of work to introduce people to the issues we face in managing this little known Wild and Scenic River and listen to people's concerns. Consequently, I have decided to modify Alternative 2 to address comments raised during the 30 day public review of the environmental analysis.

The project was designed to be responsive to concerns we have heard from many people since 2003 when we began the planning process for Whychus Creek Wild and Scenic River. The modifications to Alternative 2 I have discussed in this decision are responsive to concerns raised during scoping and during the 30 Day Public Comment period concerning how to manage the area to protect the Outstandingly Remarkable Values and allow public use and enjoyment. My decision, as discussed in this document, was created to address particular concerns, where possible, while not compromising the protection and enhancement of the Outstandingly Remarkable Values.

Public involvement in planning for Whychus Creek, its values, and future management has been on going on since 2003 beginning with the Resource Assessment process (EA, pg 31). In 2003 we heard from people about their concerns regarding the detrimental impacts to riparian areas from dispersed camping and vehicles, maintaining vehicle access, promoting self discovery, minimizing recreational developments, protection of unroaded areas, the need for better trail locations to protect streambanks, reducing wildfire risk, and exploring educational and interpretive possibilities.

The Whychus Creek Wild and Scenic River Management Plan began in 2007 and nineteen people sent e-mails, letters or called in response to scoping. On July 29, 2008 a public field trip to the creek was attended by twenty three people who provided oral comments. Comments centered around the need to change user groups on the creek by making low impact recreational use easier and reducing damaging use. A strong interest in volunteer stewardship was heard and the need for more education. Concerns about protecting large trees, commercial logging, post-fire salvage logging, and forest health in higher

elevation forests were also discussed (EA, pg 31).

In 2009, Whychus Creek and the Metolius River were chosen by the National Forest Foundation as a Treasured Landscapes, Unforgettable Experiences Conservation Campaign Site called “The Tale of Two Rivers”. The goals of this campaign are to revitalize and restore our National Forests and strengthen community connections to public lands through stewardship. As part of the campaign in July 2009, in partnership with the Roundhouse Foundation, an art competition was held along Whychus Creek to develop images for a “Friends of the Forest Day” Conservation Event. The winning images were also used in the Whychus Wild and Scenic River Plan and Environmental Assessment. Over one hundred people attended, learned about the creek and its stewardship issues, and volunteered along the creek, planting, removing garbage and graffiti, and removing fire rings.

The Whychus Portal EA was made available to the public for a 30-day comment period when the legal notice was published in The Bulletin, the newspaper of record, on March 22, 2011. Comments were received from five people, all from Sisters or Bend Oregon. The comments received are addressed in detail in Appendix 2.

Consultation with Native American Tribes (EA, pg 32)

Government-to-government consultation with the Confederated Tribes of the Warm Springs Reservation of Oregon has been ongoing through the series of projects (Whychus Creek Wild and Scenic River Resource Assessment, Wild and Scenic River Plan, and Whychus Portal Project). There have been multiple contacts with various branches of the Tribal government, Tribal Resource Specialists, and the Culture and Heritage Committee, a group of elders with special knowledge of both history and cultural aspects important to the Tribes. The Confederated Tribes provided comments by letter (Currim 2003) and in meetings. The river values identified by the Tribes as most important were:

- **Hydrology:** Especially in regard to the headwaters that are glacially fed and the wet meadow systems.
- **Fish:** Especially with respect to downstream effects on habitat and the reintroduction of steelhead and spring chinook.
- **Wildlife:** Especially with respect to migratory corridors for mule deer in transition to summer range and spotted frogs within lake sites. (*Note: there are no known spotted frog sites on Sisters Ranger District*)
- **Cultural Resources and History:** Especially with respect to known cultural sites.

Additional consultation occurred with Tribal Resource Specialists in 2009 and 2011 regarding Whychus House Cave and its future management. Our assigned representative for off reservation projects at The Confederated Tribes of Warm Springs was consulted and participated in a field trip to the project area (Clay Penhollow, 2011, Personal Communication).

Finding of No Significant Impact

After considering the environmental effects described in the Environmental Assessment, I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. I base this finding on the following:

1. My finding of no significant environmental effects is not biased by the beneficial effects of the action. Although the scope of the effects are insignificant, there could be relatively minor benefits and negative aspects to the environment. Potential benefits include: better protection and enhancement of the Outstandingly Remarkable Values (EA, pg 62-69), improvements to people's experience related to a variety of recreational experiences and scenic and environmental quality (EA, pg 110-112, 171-174, and Appendix X of this document), and reduced pressure on the Wild Section of the Creek in the Three Sisters Wilderness. Potential minor negative and cumulative effects to recreational access could be: increased low impact recreational use, reduced motorized access and reduced dispersed camping along the creek in areas where resource damage is occurring or where a lower level of use is desired to meet the semi-primitive setting, and a change in experience in some areas for those who prefer self discovery (EA, pg 171, and Appendix 4 of this document).
2. There are no significant impacts on public health and safety. Public safety may improve as management controls are initiated which discourage vandalism and resource damage and as managed stable trails replace eroding and often steep user created trails in highly used areas.
3. There will be no significant effects on unique characteristics of the Wilderness, prime farm lands, or historic resources by the implementation of my decision (EA, pg 175-176). This decision begins implementation of priority management actions identified for the protection of the Outstandingly Remarkable Values on pg 60 of the Whychus Creek Wild and Scenic River Management Plan, (2010).
4. The effects on the quality of the human environment are not likely to be highly controversial. There is no known scientific controversy over the impacts of the project. Management actions to manage Wild and Scenic Rivers, such as those discussed, are done in other areas throughout this Forest and on many other National Forests.
5. We have considerable experience with the types of activities to be implemented. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk (EA, pages 62-176, and Appendix 2 and 3 of this document). The action is not likely to establish a precedent for future actions with significant effects, because these types of projects are common in the region and do not lead to significant effects to the human environment. There are no significant effects associated with the project (EA, pages 62-176, and Appendix 2 and 3 of this document).
7. The cumulative impacts are not significant (EA, pages 62-176, and Appendix 2 and 3 of this document).
8. The action will have no significant adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places (EA, 113-120). The action will not cause loss or destruction of significant scientific, cultural, or historical resources because heritage sites will be protected during future site specific planning (EA, pgs 113-120). The State Historic Preservation Office has concurred (Pouley, J. July 12, 2011). Tribal consultation has occurred and supports the proposed action (Clay Penhollow, 2011, Personal Communication).
9. The action will not adversely affect any endangered or threatened species or its habitat that has been

determined to be critical under the Endangered Species act of 1973 (EA, pgs 97-106, 121-153, 154-161). Consultation with the US Fish and Wildlife Service was not required.

10. The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the analysis (EA, pgs 13-24). The action is consistent with the Deschutes National Forest Land and Resource Management Plan as amended by other applicable laws and plans (EA, pgs 13-24).

Findings Required by Other Laws and Regulations

My decision to implement Alternative 2 Modified is consistent with the intent of the Deschutes Forest Plan's long term goals and objectives listed on pages 4-1 through 4-30 of the Deschutes National Forest Plan Land and Resource Management Plan, as amended by other applicable laws and plans (EA pages 13-24). The project was designed in conformance with land and resource management plan standards and incorporates appropriate land and resource management plan guidelines for wildlife, plant, and fish habitat, Scenic Resources , cultural site protection, recreation management, and soil and water quality protection (EA, pages 57-60, and the Deschutes Forest Plan, pages 4-31-163).

Implementation Date

If no appeals are filed within the 45-day time period, implementation of my decision may occur on, but not before, five (5) business days from the close of the appeal filing period. When appeals are filed, implementation may occur on, but not before, the 15th business day following the date of the last appeal resolution.

Administrative Review or Appeal Opportunities

The 30-day legal notice to comment on the EA was published on March 22, 2011.

This decision is subject to appeal pursuant to 36 CFR 215. Any written notice of appeal of the decision must be fully consistent with 36 CFR 215.14, "Appeal Content." The notice of appeal must be filed hard copy with the Regional Forester, ATTN: 1570 APPEALS, 333 S.W. First Avenue, P.O. Box 3623, Portland, Oregon, 97208-3623, faxed to (503) 808-2339, sent electronically to appeals-pacificnorthwest-regional-office@fs.fed.us, or hand delivered to the above address between 7:45AM and 4:30PM, Monday through Friday except legal holidays. The appeal must be postmarked or delivered within 45 days of the date the legal notice for this decision appears in The Bulletin. The publication date of the legal notice in The Bulletin is the exclusive means for calculating the time to file an appeal and those wishing to appeal should not rely on dates or timeframes provided by any other source.

Electronic appeals must be submitted as part of the actual e-mail message, or as an attachment in Microsoft Word, rich text format or portable document format only. E-mails submitted to e-mail addresses other than the one listed above or in other formats than those listed or containing viruses will be rejected. Only individuals or organizations who submitted substantive comments during the comment period may appeal. This project may be implemented 50 days after this legal notice if no appeal is received. If an appeal is received the project may not be implemented for 15 days after the appeal decision.

Contact

For additional information concerning this decision or the Forest Service appeal process, contact Maret Pajutee, Project Leader, Sisters Ranger District, PO Box 249, Sisters, OR, 97759, (541) 549-7727, e-mail: mpajutee@fs.fed.us.

/s/ William Anthony

WILLIAM ANTHONY
District Ranger
Sisters Ranger District

August 1, 2011

Date

References:

Dachtler, N. 2010. Biological Evaluation/Assessment and Fisheries Report for Aquatic Threatened, Endangered, and Sensitive (TES) Species, Sisters Ranger District. Deschutes National Forest. Whychus Portal Environmental Assessment Planning Files.

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Pouley, J. 2011. Concurrence letter from the State Historic Preservation Office on the Whychus Portal project. Whychus Portal Environmental Assessment Planning Files.

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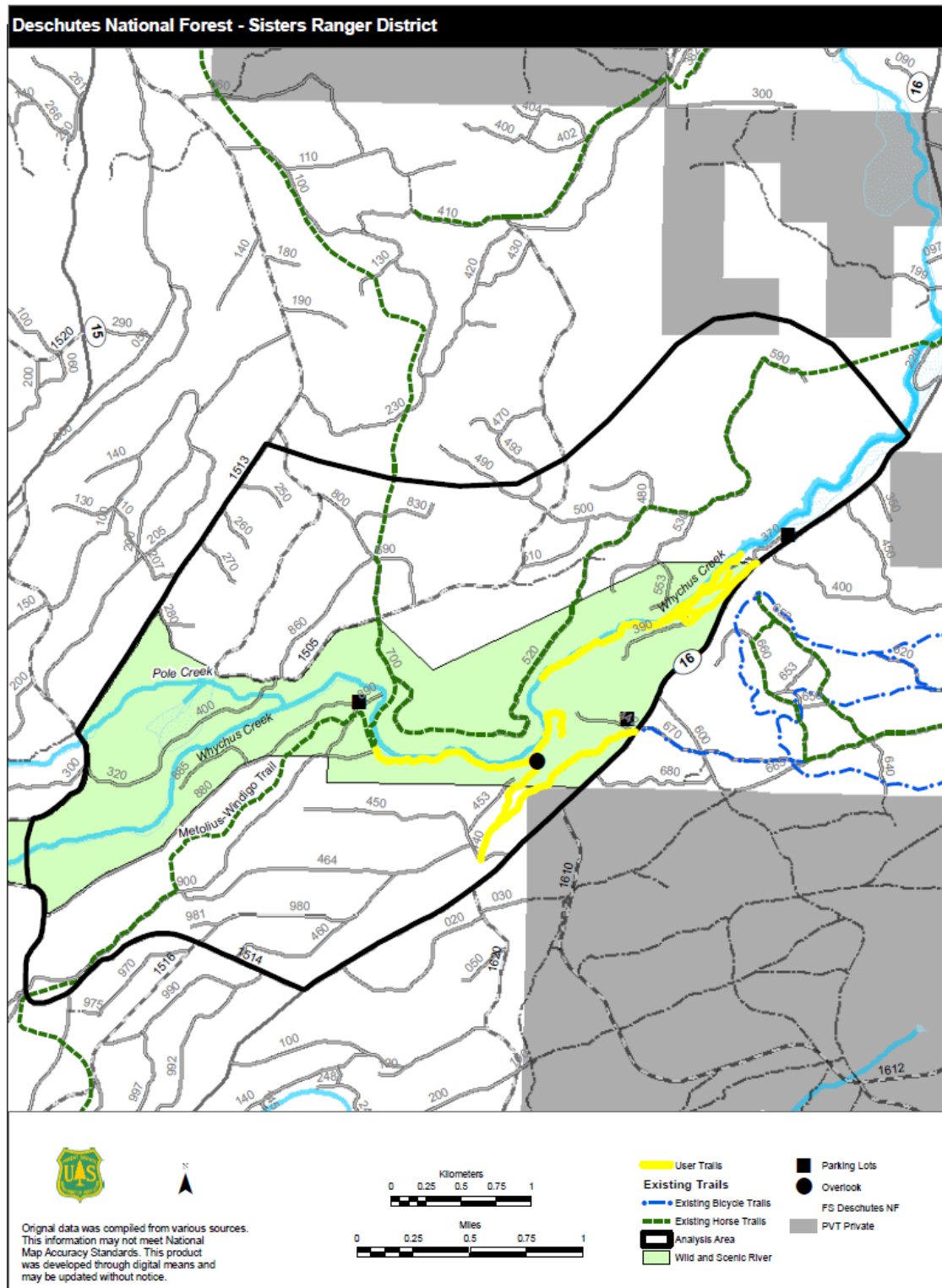
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USFS 2009. Whychus Watershed Analysis Update. Deschutes National Forest. Sisters Ranger District, Sisters, OR.

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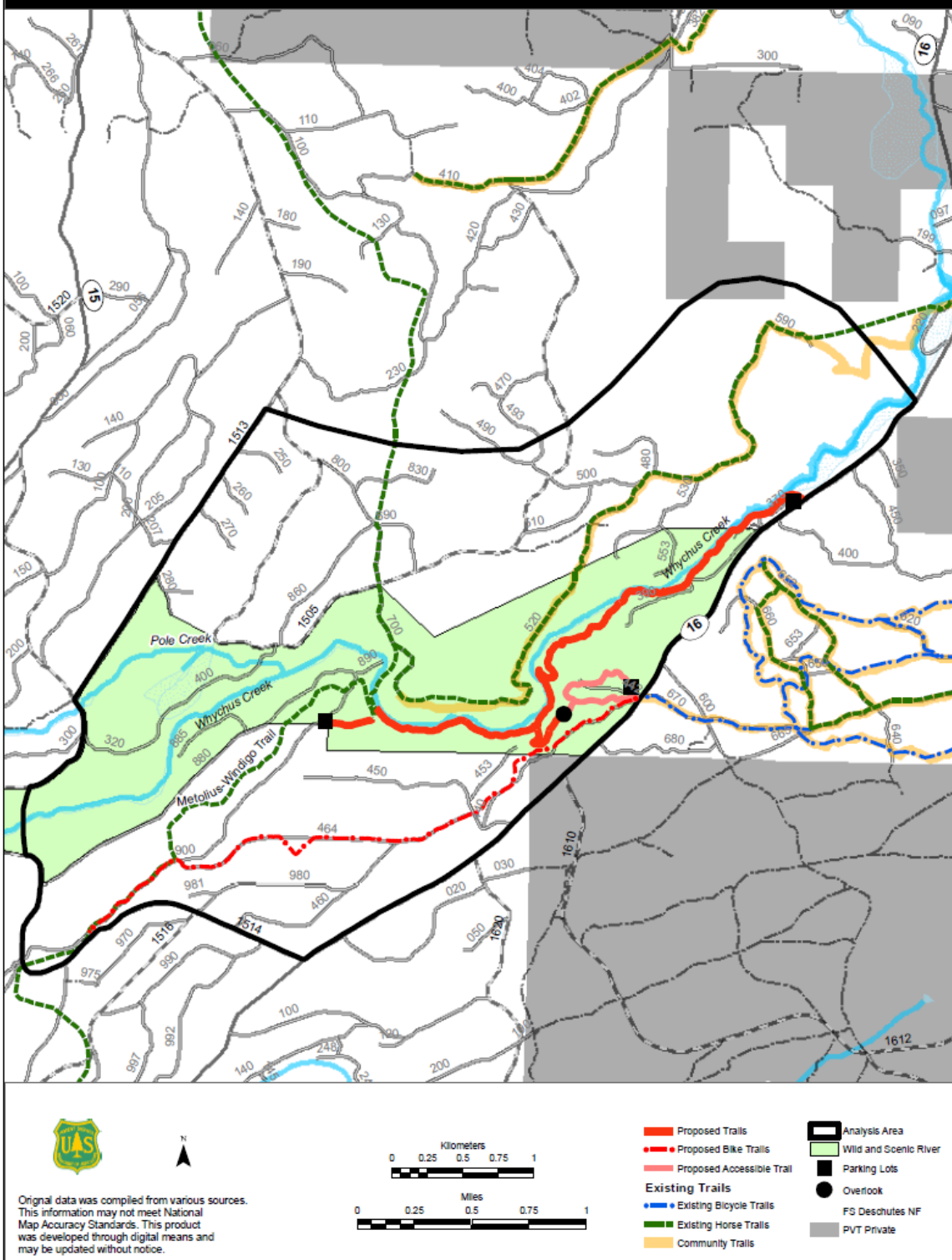
USFS. 2010b. Whychus Creek Wild and Scenic River Management Plan. Deschutes National Forest. Sisters Ranger District, Sisters, OR.

Appendix 1- Whychus Portal Project Environmental Assessment MAPS



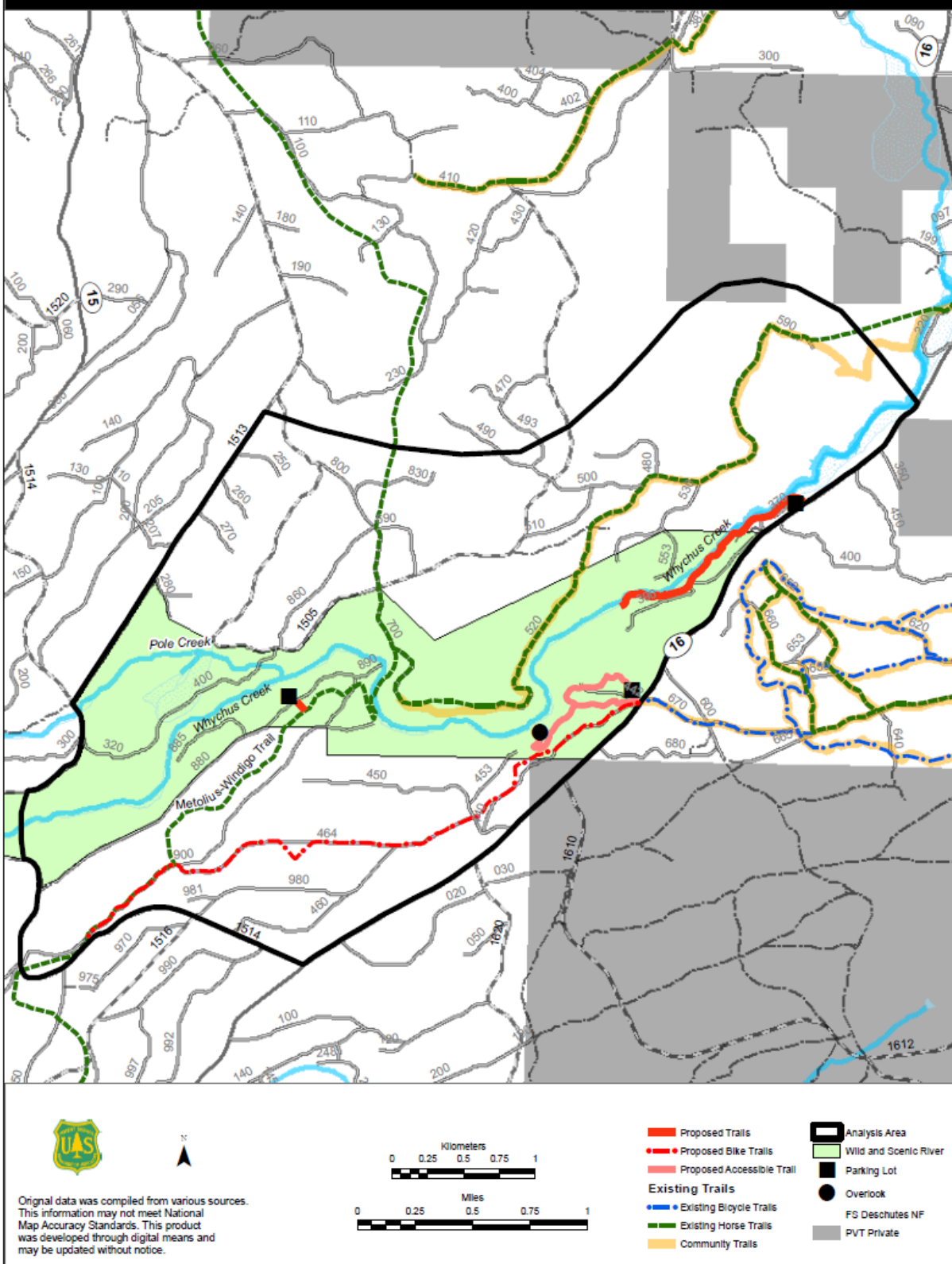
Alternative 1- No Action - User Trails and Roads

Deschutes National Forest - Sisters Ranger District



Alternative 2 Modified- Proposed Action

Deschutes National Forest - Sisters Ranger District



Alternative 3- Less Development, Maximize Primitive Character

APPENDIX 2

Whychus Portal Project-Response to Public Comments



Proposed Whychus Overlook Location

Thank you for reviewing the Whychus Portal Environmental Assessment and taking the time to send us your comments. The following is a summary of the public comment we received at the Sisters Ranger District regarding the Environmental Assessment (EA) for the project. Respondents are listed in Appendix 4.

The EA was made available for a 30-day comment period, on March 22, 2011 under the provisions of the National Environmental Policy Act (40 CFR 1500-1508) and Notice, Comment, and Appeal Procedures for National Forest System Projects and Activities (36 CFR 215). The comment period closed on April 21, 2011.

Content analysis is a method for analyzing public comment. This process strives to identify all the relevant issues people raise in their reviews. The intent is to represent the public's viewpoints and concerns as fairly as possible, and to present those concerns in such a way as to assist the decision maker and the Interdisciplinary Team in responding effectively. It is important to recognize that the consideration of public comment is not a vote counting process in which the outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. However, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. For ease of reference, comments are arranged by topic.

During the 30 day public comment period we received comments from five people, all from Sisters or Bend, Oregon. All the respondents had been involved with the project since project scoping or earlier. Most people were supportive of the project. One person had concerns that the project was too focused on recreation development, disagreed with portions of the trail design, believed we had drawn incorrect conclusions and done inadequate analysis, and felt the project would have impacts to treaty rights and wildlife.

All page numbers cited refer to the Whychus Portal Project Environmental Analysis (EA).

Planning and NEPA

Supportive of Process

Thanks for including climbers in the process. Have reviewed the document, have shared info with other climbers so they could comment. Ready and willing to help execute whatever alternative is favored.

ES-1

Appreciate being included in development of River plan and this project. Believes Sisters Ranger District has thoroughly reviewed natural and human impacts and presented alternatives to address impacts. Looks forward to supporting the District in rehabilitation of the lower Whychus Creek area.ET-1

Response: We appreciate the offers for help with the areas stewardship and will be counting on it.

Supportive of Alternative 2

Good proposal. Access management changes proposed will create physical setting to encourage quiet enjoyment and discourage inappropriate use. Level of vandalism now makes her feel unsafe there. Defining trails most important change to reduce damage, as at Alder Springs. Alt 2 is good compromise for diverse needs- area should be somewhere in-between wilderness and recreation area. Understands sensitivities about Brads Trail and perhaps it never should have been made but does offer quiet wilderness like experience. Supportive of no bridge and no bike path into canyon which would encourage overuse. Bridge would incur long lasting expense for upkeep, funds better spent for more worthy projects. Road closures and decommissioning long overdue. Benefits for wildlife and vegetation and experience. Fewer access points and visible parking will make oversight easier.EE-1

Alternative 2 incorporates limited access to lower Whychus Creek area while reducing potential damage for unauthorized use. Fair and reasonable compromise between those who want more access and those who would like to impose greater restrictions. ET-2

Response: We appreciate the support and assistance this person has given to the project.

Level of NEPA

...For all of the above reasons and as stated in our earlier comments, I believe that more information is needed and an EIS should be done, considering the significant effects on the human environment. PD-36

Response: The Decision maker must consider all comments during his decision regarding significance of project effects and determine whether there is a significant effect to the human environment and whether an EIS should be done. The Decision maker appreciates this thoughtful letter but respectfully disagrees with the conclusion that there are significant effects on the human environment from this project. The rationale for this decision is outlined in specific responses to comments (below) and in the Decision Notice (pg 19-20).

Purpose and Need

This is first and foremost a recreation development plan that is not appropriate in a Scenic section of a Wild and Scenic River. It elevates what is merely a “significant resource,” recreation, over the Outstandingly Remarkable Values of cultural resources, scenic quality, geology, etc. PD-2

Response: The main threat to the Outstandingly Remarkable Values of Whychus Creek is the uncontrolled use of the area by people (EA, pgs. 29, 30, 40, 87, 101, 103, 109, 110, 115, 116, 131, 134, 143, 147, 150, 155, 157, 160, 166, 168, 169, and 170). Therefore, much of the project deals with how to manage human access and reduce activities which are harming the Outstandingly Remarkable Values in the lower 3 miles of the 8.8 mile long Scenic River corridor. Managed use is more beneficial than unmanaged use to protect and enhance the Outstandingly Remarkable Values. It is also important to educate visitors about the creeks’ special values, and opportunities to be involved with stewardship. The population of Central Oregon and Sisters is increasing and use in the area is expected to increase no matter what we do, so managing this use will become only more important to protect the creeks’ values for future generations.

The Whychus Portal Project was designed to comply with the Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) which provides direction on the goals and management of the Scenic Section of the river and prioritizes the need for recreational management in the lower corridor, including some facility development, primarily for resource protection to reduce harmful use. It says:

“Management of the scenic segment of the river corridor is to focus on maintaining and enhancing the near-natural environment. It emphasizes the natural appearance of vegetation, protection of riparian plant communities, and consideration of the river’s outstandingly remarkable values in managing uses and activities. The riverbanks should be largely undeveloped and primitive, but would be accessible in places by roads or trails. Inaccessible areas which currently have little use and which provide high quality wildlife refugia would be retained.”

“The area should have a natural-appearing setting with limited improvements. There would be a gradient of management controls so areas closer to the City of Sisters would provide more facilities to manage use and higher reaches closer to the wilderness would provide fewer facilities. A few recreational facilities close to the City of Sisters are allowed to be developed to manage use to protect river values and provide interpretive and stewardship information. Recreational facilities such as trails or dispersed camping areas are to be designed or managed to protect riparian areas, relocated, or removed. Access points such as trailheads, parking areas, information kiosks, or viewpoints should be strategically located in the corridor or adjacent to the corridor to manage recreation use.” (EA, pg 14)

The Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) allowed for providing opportunities for semi-primitive recreation experiences associated with enjoying the water, forests and mountain views while hiking, watching wildlife, camping, hunting, and fishing. Semi-primitive motorized recreation experiences are defined (EA, pg 16) as generally within ½ mile from primitive roads, in a largely undisturbed natural environment with little evidence of human development, minimal facility development primarily for resource protection, where low to moderate numbers of people may be encountered (6-15 groups/day).

The project was specifically designed to protect and enhance the Outstandingly Remarkable Values by reducing threats and restoration of impacts (ie. restoring user trails, closing roads, reducing and restoring campsites, and controlling and designating access) (EA, pg 45, 46). It is also important for

the long term protection of the area to educate visitors about the creeks special values and opportunities to be involved with stewardship.

The EA inappropriately uses abuse in one area to justify recreation development in another area where the abuse does not exist or is too minor to justify the recreation development. The abuses in the cave area are no justification for a trail system that extends several miles upstream of the cave. This is essentially an impermissible bootstrapping of justification of a trail in one area based on an abuse in another area. PD- 4

Response: The proposed action is designed to manage human access to protect the Outstandingly Remarkable Values from an increasing pattern of damage in the lower 3 miles of the 8.8 mile scenic river segment of the Whychus Creek Wild and Scenic River. The Whychus Creek Wild and Scenic River Management Plan (USFS 2010) identified immediate actions were needed in this area

It is unclear what the comment means by “*impermissible bootstrapping of justification of a trail in one area based on an abuse in another area*”. One definition of bootstrapping refers to “The technique of starting with existing resources to create something more complex and effective”. This is the purpose of the actions proposed.

The project addresses a network of eight major areas of management concern and the commenter may not be aware of the level of impacts and abuses which have been occurring. Resource concerns and design solutions are outlined below and additional information about the detrimental effects to Outstandingly Remarkable values and Significant values can be found the EA (EA, pgs. 29, 30, 40, 87, 101, 103, 109, 110, 115, 116, 131, 134, 143, 147, 150, 155, 157, 160, 166,168, 169, and 170). Vandalism is expected to drop because of increased visibility of vehicles, reduced motorized access and change in user groups with hikers deterring vandals because of lack of privacy.

1) Outside Whychus WSR Corridor - Rd 370 - The end of Rd 370 is a party spot and the floodplain and peninsula below the roads’ end is a popular resider camp spot, subject to tree cutting, trash, some domestic animals (resider’s pet cats and dogs), and human waste. Forest Service Law enforcement has been involved with multiple incidents here. The beginning of the road also has unscreened irrigation water diversions from Whychus Creek to Runcos and the Lazy Z Ranch. Vehicle access was requested by irrigators and would be maintained with a gate to access the first segment of road. A small visible parking area and a dispersed a camping closure here will eliminate resider access to the creek, and reduce vehicle use and easy access for partying/camping. The enforcement of a day use only restriction and our ability to identify vehicles of people using the area will greatly reduce opportunities for harmful activities. All 8 dispersed campsites in this area have damaged vegetation or cut trees and will be closed to camping and restored.

2) Rd 390/Hydrological Gauge/Rockshelter - The Rd 390 leads into a system of open Forest Service and user created roads that access several dispersed camping areas, a rockshelter/rock climbing area and dispersed camping area, and a user trail network. Portions of the road have been closed but the area continues to be the site of numerous illegal road breeches, tree cutting, shooting, trash, and defacing signs. With the parking sited at the end of Rd 370 all roads in this area would be decommissioned permanently and restored with native vegetation. User trails would be eliminated and restored while designing one trail through the area leading people to some popular areas on the creek without causing erosion, and excluding them from or moving them past other sensitive areas. No dispersed camping would be allowed in the area because of damaged vegetation or cut trees and areas

would be restored as needed. Rock climbers from Central Oregon Rocks, INC have agreed to assist the USFS with monitoring and photopoints of 6 rock climbing areas within the project area including one here.

3) Whychus House Cave - This cultural site has been damaged by camping, climbing, campfires, graffiti, trash, shooting, and tree cutting. Graffiti was removed by the Forest Service in 2009 after consultation with the Confederated Tribes of Warm Springs. A new trail to avoid and move people above this cave was designed to reduce access and address concerns and recommendations from the Tribes.

4) Rd 442/Cliffs - The Rd 442 leads into a system of open Forest Service and user created roads that access several dispersed camping areas and user trail network. The area is a frequent site for dumping, shooting, tree cutting, trash, and fires. With all parking sited at the beginning of Rd 442, all roads off Rd 442 in this area would be decommissioned permanently and restored with native vegetation. User trails would be eliminated and restored while designing one fully accessible hiking trail through the area, leading people to a viewpoint overlooking Whychus Creek Wild and Scenic River. This area is designed to focus most of the use by visitors to a vantage point far from the creek to reduce impacts the Wild and Scenic River while building a constituency for community stewardship. The 2 dispersed campsites in the area would be closed to camping because of damaged vegetation or cut trees and would be restored.

5) Area below cliffs/Waterfall - This area is a draw because of its scenery and waterfall below the cliffs. This area has an old road bed, a continuation of Rd 453, which was closed by a USFS youth crew 10 years ago to eliminate motor vehicle access. The old road bed leads to Whychus Creek and a large waterfall with a gentle descent. Two major user trails intersect this route- one is part of Rd 440 and leads back up the canyon to Rd 16, the other (Brads Trail) leads to the Rd 900 camp site and Metolius Windigo Crossing over Whychus Creek. A very steep user created trail used by runners (The Grunt) also accesses this area. The area has had a resider in a hidden notch along the creek, motorcycle trespass (noted by tracks), and is the location of the start of the Rooster Rock Wildfire of 2010. A cause for this fire was not determined. The proposed action was designed to decommission Rd 453 to eliminate vehicle and bike trespass, disconnect the Rd 440 bike use from the creek, and provide a stable route back up the canyon to eliminate steep eroding user trails.

6) User Trails -Brads Trail and the Grunt - Brads Trail follows old game and user trails but was improved by users approximately 15 years ago for mountain bike access. It is overly steep and too close to the creek in several places. Mountain bike use has fallen off with the development of the Petersen Ridge Mountain Bike Trail system, although occasional bike tracks are still seen. Because of the long history of local use and the draw of the attractive sites the trail connects, it would be very difficult to close. Rerouting the trail would protect hydrological values. The Grunt developed from use and is overly steep. It would be eliminated. Without a designated route out of the canyon new user trails will develop.

7) Rd 900 campsite and Metolius Windigo crossing - This area is one of the most scenic spots in the project area and has been accessed by the Metolius Windigo Trail for decades. It is also a cultural resource site that has been damaged by erosion, camping, trash, shooting, and tree cutting. A swastika was carved into an old growth tree here last year, and other racist graffiti has been seen nearby. Many of the old growth trees at the campsite have been repeatedly shot. The area has been used as a group camping spot, with over 60 people last Memorial Day (with their own porta-potty). Large boulders to

keep vehicles away from the creek were placed 5 years ago and are repeatedly moved by users. Smaller barriers are routinely (once a week) removed by users to allow vehicles closer access to the creek. Impacts to hydrology, Scenic Resources, and the cultural site are being addressed by eliminating motorized access and reducing or eliminating dispersed camping at this site. Horses pass through this area to the Metolius/Windigo Trail crossing on the creek and there has been some interest in a hiker bridge here for hikers and mountain bikes on the Metolius/Windigo Trail. The proposed action would eliminate vehicle access to the site and restore and stabilize it. If camping is allowed it would be walk-in.

8) Rd 900 - This road is adjacent to an intermittent channel of Whychus Creek and is a hydrologically connected sediment source which is also contributing to the erosion of a cultural resource site. By decommissioning the road (retaining a small connecting trail segment of the Metolius /Windigo Trail segment) this impact would be eliminated.

9) Rd 880 - This road is needed to maintain fire access to the canyon area. It provides access to the Rd 900 camping area.

As a matter of policy, it is not appropriate for the Forest Service to respond to the development of use trails or “outlaw” trails by user groups to increase trail development in an area. It is one thing to allow outlaw trails to drive recreation development in the General Forest, but it is quite a different thing to allow that in a Wild and Scenic River corridor where recreation is not an outstandingly remarkable value. PD-8

Response: The proposed action does not increase trail development but rather reduces user “outlaw” and user trail development by designing a stable sustainable foot trail and restoring user trails. Both action alternatives close more trails than they develop or designate (EA pg 67).

LandWatch reiterates its contention contained in its letter of September 7, 2010, that the proposal is inconsistent with the Whychus Wild and Scenic River Plan. PD- 24

Response: The project was designed by the same Interdisciplinary Team that wrote the Whychus Creek Wild and Scenic River Management Plan (USFS 2010) to comply with the plan. The Management Plan identified the resource damage in the area as needing immediate action to protect the creek’s values by managing access and use and restoration. Appendix 1 of the Environmental Assessment lists Standards and Guidelines from the Whychus Creek Wild and Scenic River Plan (USFS 2010) and describes how the project complies with each one (pg 188).

Scope of Proposal

Trail Bridge over Whychus Creek at Rd 900 campsite

Sisters Trails Alliance supports a foot bridge across Whychus creek near Met/Windigo crossing to provide safety for hikers and connectivity to trails to the west. We would like to note that the District Ranger has previously indicated that a bridge in this location is not prohibited and must meet certain criteria if it were to be constructed (5/14/2010 Letter from Bill Anthony attached). We do not however want the bridge issue to delay the current EA and feel if the bridge were to be constructed it could be done so under a separate EA at another time if necessary. ET-3

Response: We appreciate the Sisters Trails Alliance input and will be continuing to monitor the area. We also note that Bill Anthony's letter to the Sisters Trails Alliance about the bridge (Anthony, 2010) was incorrectly quoted in the Whychus Portal EA on the discussion about the bridge (EA, pg 55) and the commenter pointed this out. We apologize for the error.

While there are laudable and necessary resource protection measures being taken, such as the protection of the cave area and the closing of roads, the proposal ends up being an extensive recreation development plan creating a new continuous three-mile trail that parallels the Creek. PD-3

Response: Rehabilitation of the network of user trails and the creation of a managed river trail is part of the Desired Future Condition described in the Whychus Creek Wild and Scenic River Management Plan (USFS 2010), (EA, pg 163) and is a consistent use (EA, pg 164).

In both action alternatives little new trail is built (Alt 2 includes 2.8 miles of new trail construction, improving 1.1 miles of user trails and closing 3.9 miles of user trails). Most of the new trail in Alternative 2 is located on top of the canyon far from the creek. The amount of new trail versus user trails is displayed in the EA (pg 61).

Additional Alternatives

Alt 3 Modified

While LandWatch favors Alt 3, there are several possible variations of Alt 3 that might address some of the EA concerns:

a. Another option for Alt 3 is to rehabilitate and leave open the user trail open that starts at the Road 900 campsite, ban horses and mountain bikes on it, and then after about half a mile downstream eradicate any use trail along the River beyond where the main use trail cuts back to the southwest away from the Creek. That "cutback" section could then connect back to the Road 900 campsite. Most importantly, this user trail should be left a user trail and not be made part of the Forest Service official trail system that could show up on a map. PD-24a



Results of a user trail with no maintenance- the user trail below RD 900 with multiple tracks (white arrows) as people walk round downed wood

Response: We have considered your suggestion in detail. Our concern is there is no topographical control point that would effectively stop people from walking down the creek here as they have for thousands of years. The area would be very vulnerable to trail pioneering as people search for ways to continue downstream. This type of unmanaged use is damaging to the creek's Outstandingly Remarkable Values.

The proposed trail under Alternative 2 would allow foot traffic only. The Decision maker has also considered the suggestion of leaving unacknowledged user trails which are not put on maps, however he does not

believe the Wild and Scenic River values or the public is served by having “secret trails”, which receive no maintenance and are not designed to protect the creeks streambanks or hydrology. It also sends the message that user trails are OK. This particular user trail has been identified as needing rerouting to protect river values by the Project Team hydrologist and trail specialists.

Currently the user trail has many trees across it and people are making new paths around the obstacles. Ground cover is being damaged and these paths become devegetated. Some of these new paths are perpendicular to the slope causing eroding areas that can cause soil to move into the creek.

b. Another alternative would be to continue to allow the dispersed camping site at Road 900, but require that use of the site be walk-in only. PD-24b

Response: This is what is proposed in Alternative 2. The camping at the Rd 900 site would be walk-in only under Alternative 2.

c. The lower trail that is to avoid the cave would loop back on the road that is proposed to be closed. PD-24c

Response: Again there is no topographical control point that would effectively stop people from continuing to walk up the creek here.

We took a hard look at portions of this proposal and tried to develop a modified Alternative 3, which would adopt some portions of Alternative 2 and dead-end the river trails where user trails currently end to partially address these concerns (see map Pg 9). After consultation with the Project Team the Decision Maker chose not to pursue this option because no one felt it would protect the creeks Outstandingly Remarkable and Significant Values.

We would have 2 trails that end within a 1/4 mile of each other and the viewpoint parking area is less than 1/4 mi from the end of these two trails. The southern endpoint of the trail is at a topographic barrier (steep rocks and manzanita field) however it is also a narrow and sensitive canyon where we don't want much use. This modified alternative would build more creek-side trail than we believe is needed. The Team felt we would have a very hard time keeping people from making their own trails to connect the two trails and viewpoint parking area together.

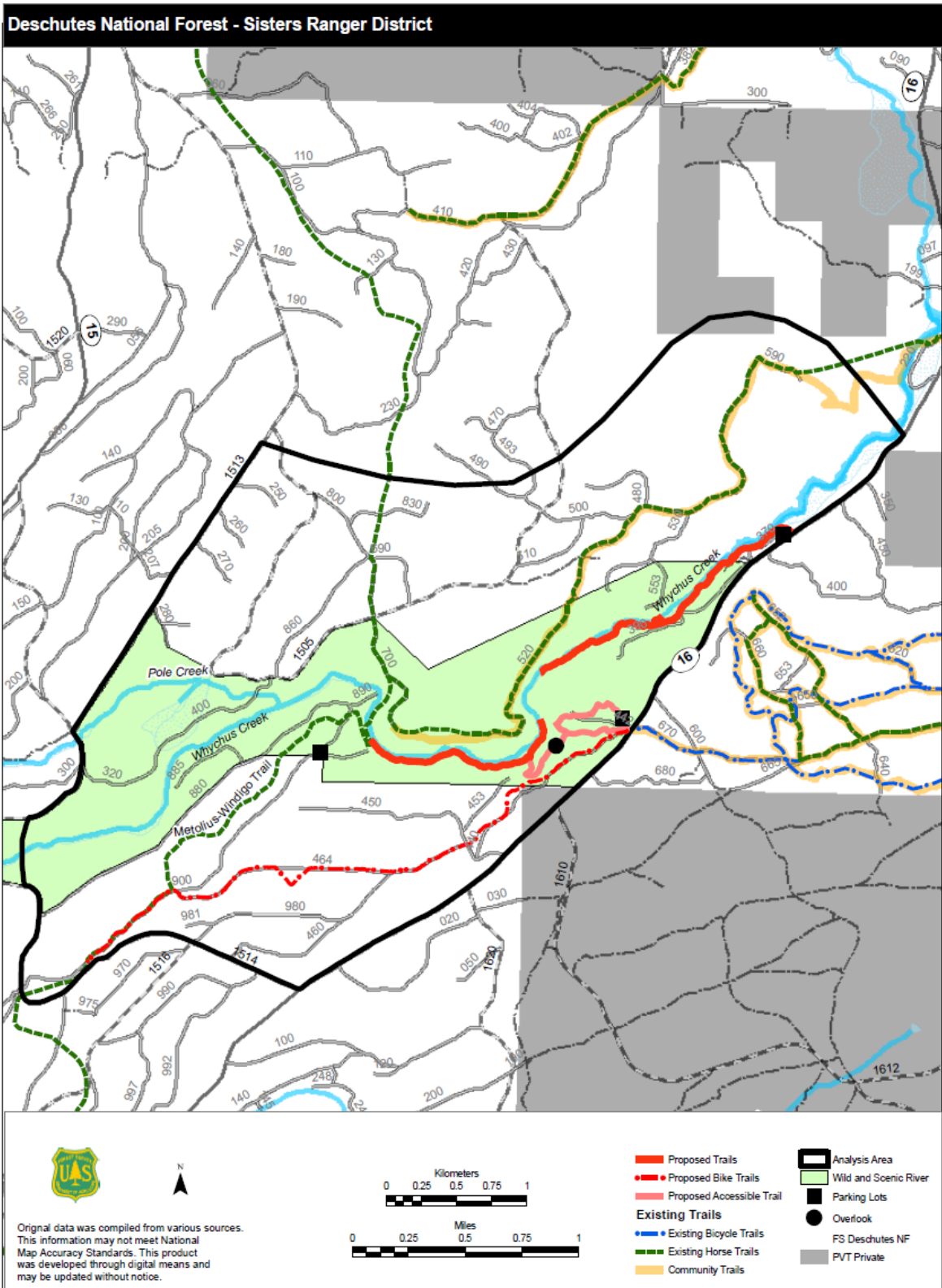


End of the user trail above Whychus House Cave-
a narrow sensitive canyon

The closed road mentioned does provide a route back, however it has little scenery or other features that would make it an attractive route and it is unlikely to be an effective route to deter people from exploring up the creek into more sensitive areas (the beautiful narrow canyon shown above). The Forest Service trail designer said this narrow canyon was intentionally left out of the trail system because he saw it as a sensitive area not able to handle significant use.



View downstream at the end of the user trail above Whychus House Cave



**Alternative 3 Modified- Considered and dropped
Existing user trails define endpoints along river trail**

Recreation Management

Knows we have struggled for many years to keep our high use trails from degrading adjacent resources, especially at scenic view points vegetation trampling and stream sedimentation are the most visible issues... Our ability to enforce is limited by our small field staff numbers, thus we need to find other less costly solutions. Meanwhile numerous other high use trails suffer from similar challenges, but without fences or signs...(lists examples) I fully expect we will have such challenges on the new Whychus Creek overlook and trail, since I expect them to quickly become high use. I think the research described in the article below offers us guidance for improvements that we might make. (Attached article: Managing Visitor Impacts in Parks: A Multi-Method Study of the Effectiveness of Alternative Management Practices, 2008, Journal of Park & Recreation Administration, Logan O. Park, Robert E. Manning, Jeffrey L. Marion, Steven R. Lawson, Charles Jacobi) The research conclusions confirm my own views on restoration and management of high use sites, developed during my 20+ years of field work and observations. It clarifies to me that, along with using varied strategies such as fencing, we consider a higher level of signing for high-use sites in and outside of wilderness, including explanations why regulations are in place. I've come to believe that if we want compliance to protect fragile resources, we need to use every tool available, not just one or two. JS-1

Response: The suggestion above and the research paper on the benefits of using a variety of direct and indirect methods to keep people on trails is a good idea and aspects of this have been incorporated into Alternative 2 modified.

Trail Design- Alt 2

The proposed trail, I believe, is masterfully done where it exits the creek corridor, going up the slope (and around the cave). I don't know how it could be done better. PD- 29

Response: Thank you. The trail designer worked hard to develop the best route to obscure the cave.

The fact that it comes back to the creek, just past the cave, is also well done because it will attract users forward. They should be less likely to explore down the rock slope toward the cave. PD-30

Response: Thank you. That was our rationale as well.

The next segment of the trail up the creek essentially follows the existing user trail. I saw no abuse or problems with this user trail that would justify any new development. It did not seem all that used and the track is quite narrow. Putting in a formal trail that will be advertised on maps will negatively impact this area and particularly the riparian area to which people will naturally be attracted. PD-31

Response: The river trail was designed to provide a sustainable an interesting stable route that would lead people from one point to another and minimize the tendency for off trail exploration. Much of the proposed trail adopts portions of user trails where they are in a benign location and causing no damage. There is no proposal to make the trail wider. Linking a "formal trail" which is designed and maintained to a "user made trail" invites people to continue forward and is not responsible management to protect river values. You can't build a system trail to a non-system trail and ignore it. People will continue to explore this creek and we maintain providing a trail in the right place designed by a recreation specialist is the best way to protect river values.

The Wild and Scenic Rivers Act does not prohibit people from enjoying a Wild and Scenic River. River managers are required to protect and enhance the river values for which it was designated while providing for public use and enjoyment which does not impact those values (Wild and Scenic Rivers Act, Public Law 90-542, Section 10.a). It is reasonable to allow public use and enjoyment by putting designated trails on a map which reduces user trail creation because people know where the trail is located.

The point at which the proposed trail begins to go south away from the creek and up toward the lookout seems arbitrary, in the sense that there is no clear barrier to people just continuing to go along the creek upstream. Perhaps a sign could be placed there saying "Scenic Lookout" this direction? PD-32

Response: Thank you, this is a good idea and could be incorporated into a sign plan.

Given the thick Manzanita in the area, the trail again seems to be in the best position possible, assuming there should be a trail there (which we don't agree with). A significant problem occurs where the trail nears the top. It first accesses "the gap", a break in the canyon wall which one can descend down to the creek. In fact, there is trail flagging down this route. I assume this trail flagging was laid out earlier and there must have been a decision not to follow it in the EA process. It certainly doesn't seem to be the route proposed on the maps in the EA. If it is the route, it is a very bad one because it provides access to a very sensitive part of the canyon. This is part of the difficulty with the maps in the EA not being topographic so that the public can clearly see what exists and is being proposed. Even if it is not part of the proposed route, people will be attracted to it by the proposed trail passing so close to it. If there does end up being a trail up to the lookout, it should be directed away from the gap. PD-33

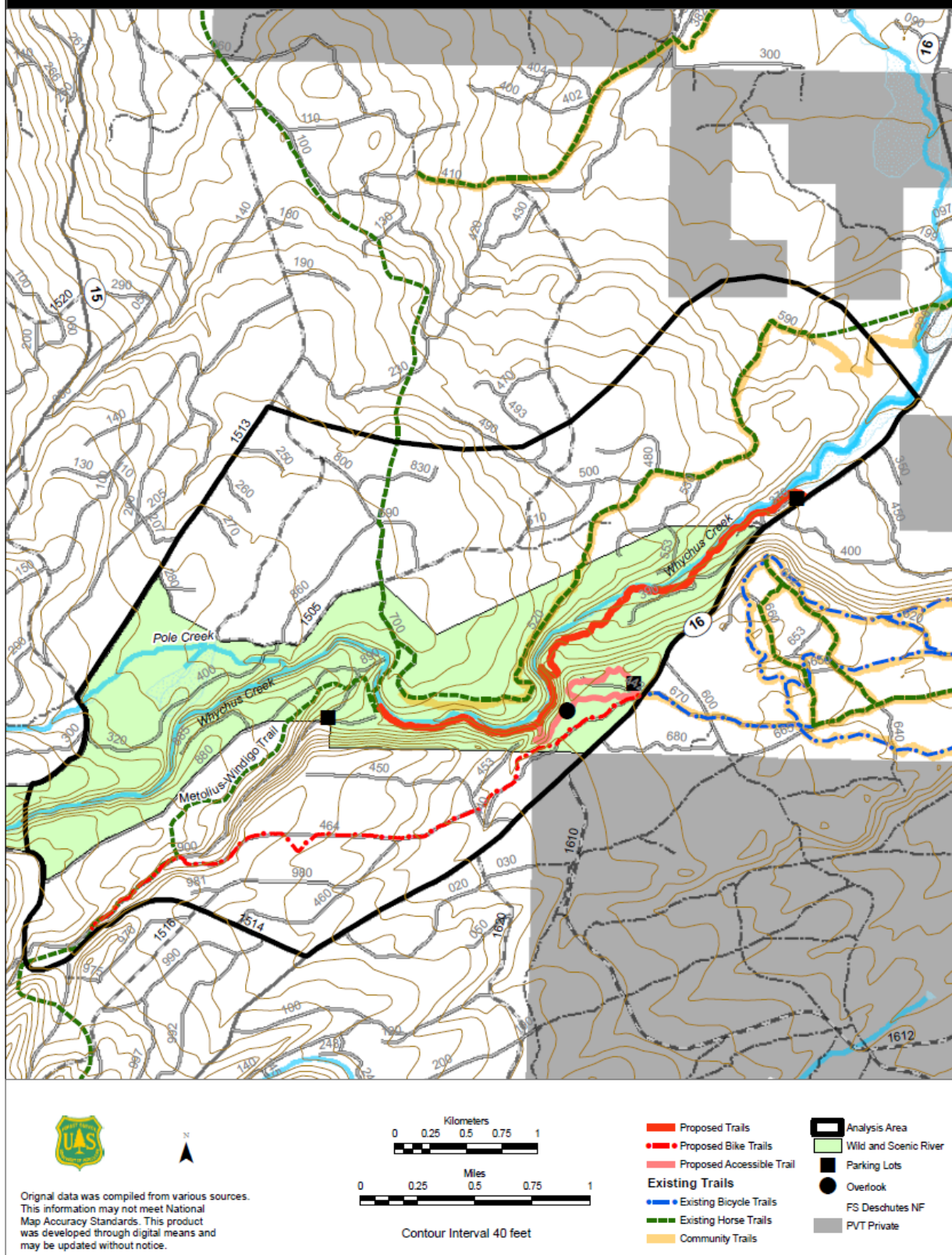
Response: The route climbing through "the gap" to the area below the cliffs is the proposed route to direct hikers to a waterfall and ultimately back to the top of the cliffs or towards Rd 900 (EA, pg 42). A map with contours is provided here on pg.12.

This area has a resider camp, was the ignition site for the Rooster Rock Wildfire, and is currently accessed by an old road bed (extension of Rd 453) and by at least 2 major user trails attracted by a waterfall (EA, pg 167 and see above "Purpose and Need" comments, section 5 and 6). By closing Rd 453 and defining one trail and closing damaging user trails we believe the area will receive less damaging impacts. A route that would lead more directly to the overlook was considered early in the trail planning process but was felt by the Project Team to create too many trails in the area.

Note that the scenic quality of the first section of the hike along the Creek is such that I don't think people will necessarily be wanting to go further. If this can be seen as just a short nature trail, people will want to just go out and come back along the Creek. PD-34

Response: We appreciate this opinion but it is not shared by our Recreation specialists and their observations of hikers throughout the Deschutes National Forest and elsewhere. Many people want more than a short nature trail and continue to explore where the terrain allows. This is a problem found on many dead end trails on the Deschutes National Forest (EA, pg 173).

Deschutes National Forest - Sisters Ranger District



Alternative 2 with contours shown

Inadequate Analysis or Incorrect Conclusions

Recreation

The description of the project, the assessment of need and impacts, and the comparison of alternatives are inadequate where the discreet portions of the project are not separately addressed. There are at least five separate areas of concern in this project area which should be addressed separately, including the cave area, from the cave to the overlook, the overlook, from the overlook down to the existing user trails off Road 900, and finally the user trails off Road 900. The five areas differ significantly in their resource protection needs and the possible solutions to the resource problems. PD-5.

Response:

We have provided a more in-depth discussion of 8 major areas in the project above (see Pg. 5 above, under “Purpose and Need”). Discussion about the detrimental effects to Outstandingly Remarkable values and Significant values occurring in these areas can also be found the EA (EA, pgs. 29, 30, 40, 87, 101, 103, 109, 110, 115, 116, 131, 134, 143, 147, 150, 155, 157, 160, 166, 168, 169, and 170).

The recreation development bias in the EA is clearly shown in the failure to acknowledge that there will be increased use of the area because of the official establishment and mapping of a new trail system. The EA does not estimate any increased use or assess impacts from the increased use. PD-7

Response: The Carrying Capacity and Use Limits for Whychus Creek Wild and Scenic River were defined in the Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) and are discussed in the EA (pg 16). The plan uses the Recreation Opportunity Spectrum (ROS) to define appropriate levels of development, and other factors including social encounters (use). The ROS for the Scenic section of the Wild and Scenic River was changed by the Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) to a lower level of development (from Roaded Natural to Semi-Primitive Motorized). In this setting low to moderate numbers of people may be encountered (6-15 groups/day). The desired ROS setting was used to design parking lots sizes and the trail system, including the one-way loop trail on top of the canyon.

The effects of increased use are considered under each resource area. In all cases analysis found that the Outstandingly Remarkable and Significant Values benefit from increased management, change in user groups, reduced road access, a designated trail, reduced dispersed camping, and closure and rehab of impacted areas (EA summary, pg 62- 69).

The effects of increased use on the primitive character of the area was an analysis issue (pg 33, 34, 35) and Alternative 3 was developed to address this issue (EA, pg 47-51). Another Alternative to reduce use further by closing roads and all trails and leaving the entire area to self discovery (Alternative 4) was considered but not analyzed in Detail because it was found to be inconsistent with the Whychus Creek Wild and Scenic River Management Plan due to impacts of uncontrolled use and difficulty in restoring areas without removing use (USFS, 2010) (pg 52-53). The effects of increased use on user experience are discussed in the Recreation Analysis (EA, pg 170-174).

There is also an inadequate showing of the surrounding recreation uses and trails such as the Peterson Ridge Mountain Bike Trail that is mentioned at pages 7-8 of the EA. See the attached maps of the extensive trail system in the area, including Ex. A of “Sisters Community Trails” (with the approximate location of the new proposed trail marked in yellow), Ex. B of the “Peterson Ridge Trail,” and Ex. C of the 2011 “Peterson Ridge Rumble” route (which was apparently run only ten days ago and in part through the Wild and Scenic River corridor.) PD-11

Response: The existing trails in the area are discussed (EA, pg 74,167) and shown on all Alternative Maps (EA, pg 40, 42, 50). The Desired Future Condition defined by the Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) (EA, pg 163) discusses these trails and the need for users of these trails to pass through the river corridor. A Standard and Guideline for the Whychus Creek Wild and Scenic River (WWSR- R-2) requires that opportunities for mountain bikes or equestrian uses are provided on closed roads or off-river trails.

The “Peterson Ridge Rumble” has not passed through the Whychus Creek Wild and Scenic River Corridor since the plan went into effect. The website for the event states:

“2011 COURSE NOTICE! Sisters Trail Committee is continuously upgrading our the Peterson Ridge trail complex, and as such, we will be utilizing as many of these new trails as possible, meaning there will once again be a slightly different Rumble course. Also, due to circumstances beyond our control, "The Grunt" section had to be taken out due to Forest Service requirements.” <http://ultrasignup.com/register.aspx?did=11870>.

Where is the referenced mountain bike use on the streamside trail, mentioned at EA 6? The public needs to see in the EA exactly what uses/abuses are occurring in what areas to assess whether the proposed recreation development for each area is appropriate. PD-12

Response: The mountain bike use on this trail (Brads Trail) is discussed in the EA (pg 176) and further in this document on pg 5, section 6. Mountain bike use on this user made trail has fallen off since the creation of the Petersen Ridge Mountain Bike Trail system, although occasional bike tracks are still seen. The present configuration of user trails links a connection for bikers from Rd 440 (a connector to the Metolius Windigo Trail) to this area by user trail connection to Rd 453 (shown on map in EA, pg 40) and is an temptation for some bikers.

The Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) does not allow bikes or horses on streamside trails so we propose to close this connection and decommission Rd 453. “Brads Trail” has been evaluated by Team Specialists and found to be located too close to the creek in some places, within intermittent drainages, and in some places is too steep causing erosion (EA, pg 86,89,90,167).

Where are the bouldering and climbing areas? There is no assessment of whether recreation climbing should trump preservation of the outstandingly remarkable values of geology and scenic quality. PD-13

Response: The climbing sites were not included in the EA to minimize publicity of Whychus Creek as a rock climbing area and keep use low, as it is currently. Climbing use is expected to stabilize after dispersed camping and road closures that provide easy access to several spots. We can show the commenter where the sites are located.

The issue of recreational rock climbing was addressed in the Whychus Creek Wild and Scenic River Management Plan (USFS, 2010) with specific Standards and Guidelines and discussed in the EA (pg 77). We have been working with Central Oregon climbers through the organization, Central Oregon Rock. INC to publicize these new regulations to climbers through their website /Facebook page (including the closure of Whychus House Cave to climbing, camping, and campfires). During the planning of the project we met with local climbers to discuss self policing and map their climbing sites so small indistinct spurs could be left open and we could understand their relationship to the proposed trail. They have agreed to assist with photo-monitoring which will begin once this project decision is made.

The maps, such as at page 42 of the EA, are of an inadequate scale to clearly show where user trails currently exist and where new trails would be located so that the public can assess what tradeoffs are involved. PD-15

Response: These color maps are meant to show approximate locations. We can provide additional maps of larger scale and we have provided a larger map with contours to the commenter. We are also available to tour the area with interested people.

This EA which concerns a Wild and Scenic River needs to be based on actual data and measurable limits. What is “frequent” local use (EA 111)? What measurements of trails and levels of use apply to what segments of the project area? PD- 16

Response: The measures for recreation used to compare alternative effects are listed in the EA in the Table on pg 67-69. We acknowledge we don’t have quantitative data on the use that is occurring in the area now beyond anecdotal observations by specialists and law enforcement and reports from people who frequently use the area.

However, we do have quantitative data on the physical impacts of the current use and have documented the ongoing resource damage by measures such as miles of user trails or roads created, number of dispersed camp sites, area of devegetation, and have documented many instances of vandalism and damage to the area in the EA through descriptions and photos (EA, pgs. 29, 30, 40, 87, 101, 103, 109, 110, 115, 116, 131, 134, 143, 147, 150, 155, 157, 160, 166,168, 169, and 170).

The comparative analyses between Alts 2 and 3 repeatedly assume greater negative impacts for Alt 3 because of greater risk of user trails. If anything, there is greater risk of user trails off the proposed new trail. Though the proposed trail is designed to stay away from the Creek in key places, no one hiking the trail will not know where the Creek is. The assumption that creation of this new trail will not result in any new user trails off of it is unfounded. Further, the comparative analyses do not consider the greater use of the area that will occur due to the mapping and advertising of the new official trail and connecting it to the existing and extensive trail systems. PD-19

Response: We acknowledge that user trails will develop under either Alternative (EA, pg 170, 171) however we believe the risk is higher under Alternative 3 for the reasons stated below.

The analysis assumes greater risk of user created trails in Alternative 3 to all Outstandingly Remarkable and Significant Resources because so little trail near the creek is provided (1.1 miles) in an area where users have freely roamed for years and have created much longer user trails to get where

they want to go. Trail end points in Alternative 3 provide no topographic barriers to limit where people will explore but there are attractions to which they will be drawn.

We also used the expertise of recreation and trail specialists who applied their experience and recreation management trail design principles to the project. Most, but not all people will usually stay on a trail if it is designed correctly to draw them forward and it is leading them somewhere they want to go. As discussed on Pg 7, a variety of direct and indirect methods must be used to keep people on trails.

We acknowledge more use will occur in the area, no matter which Alternative is implemented, including if we do nothing (EA, pg 166). Population growth in Sisters and Central Oregon has increased and so have the impacts to the area which is 4 miles from the City of Sisters. This is why it identified as a priority for management action to address damage to the Outstandingly Remarkable and Significant Resources in the Whyhous Creek Wild and Scenic River Management Plan (USFS, 2010). Increasing use is also discussed in the response above on pg 12.

The proposed trails purposefully do not connect river trails to any existing trails. This is why no bridge is proposed at the Metolius Windigo Crossing and why roads and user trails are strategically closed to prevent Peterson Mountain Bike trail users easily straying onto riverside trails.

The Wild and Scenic Rivers Act does not prohibit people from enjoying a Wild and Scenic River. River managers are required to protect and enhance the river values for which it was designated while providing for public use and enjoyment which does not impact those values (Wild and Scenic Rivers Act, Public Law 90-542, Section 10.a). It is reasonable to allow public use and enjoyment by putting designated trails on a map which reduces user trail creation because people know where the trail is located. We believe it is an opportunity to build awareness, appreciation, and long term stewardship of the area for present and future generations.

The EA also assumes that user trails will develop from the endpoints of the two trails in Alt 3. That is not correct with regard to the overlook trail where there is a clear destination for the trail. People will use the trail for the view and then go back to their cars. The cliff and thick manzanita in the area would discourage "exploration" for most people, and that might be aided by a special sign on ticks and Lyme disease at the lookout. As for the dead-end trail near the cave, why not make it a loop instead, using the decommissioned road? PD- 20

Response: The relative risk of user trails is discussed above on pg 15. We appreciate this opinion about where people will go but it is not shared by our Recreation specialists and their observations of hikers throughout the Deschutes National Forest and elsewhere. While we believe the majority of casual visitors will be satisfied with a quick look at the overlook view, we believe others will not and will explore, making their own routes or reopening the old user trails. This is a problem found on many dead end trails on the Deschutes National Forest (EA, pg 173). The idea of a loop near the cave is discussed above on pg. 8.

Recreation - Inadequate Cumulative Effects

The cumulative effects of all the recreation development in the area and the proposed recreation development in the Wild and Scenic River Corridor are not addressed, though the impact of creating this new trail in the river corridor could be substantial due to all the connections to the surrounding trail system. This will be the first trail segment in the area to so closely parallel the Creek and will

*thus draw substantial use from the surrounding existing trail system. The EA acknowledges the connections to the Peterson Ridge and Metolius-Windigo trails but does no cumulative effects analysis.*PD-22

Response: The basis for the effects analysis including Cumulative Effects is found in the EA on pg 70-76 and discusses both existing and reasonable foreseeable trails and recreational developments. The commenter is correct that the Recreation analysis does not fully address Cumulative Effects (EA, pg 174). There was an error that omitted a complete analysis. The Recreation Cumulative effects analysis tiers to the Cumulative effects analysis for Recreation in the Whychus Creek Wild and Scenic River Management Plan Environmental Assessment (USFS 2010a) and the amended analysis is attached as Appendix 3, pg 51. The scope of the recreation cumulative effects analysis area is defined as the upper Whychus and Three Creeks Watershed- from the headwaters to the City of Sisters. The timeframe considered is from 100 years in the past to approximately 10 years in the future.

The proposed trails purposefully do not connect river hiking trails to any existing system trails. This is why no bridge is proposed at the Metolius Windigo Crossing and why roads and user trails are strategically closed to prevent Peterson Mountain Bike trail users from straying onto riverside trails.

There will be a variety of cumulative effects from the project and the vast majority of these effects are beneficial to Whychus Creeks Outstandingly Remarkable and Significant Values (EA pg 92, 105, 112, 118, 119, 120, 132, 134, 135, 145, 146, 148, 149, 151, 153, 161, 174, Appendix 2- pg 23).

There are beneficial cumulative effects to the creeks hydrology and Fish predicted by the decommissioning of roads, trails and dispersed campsites combined with ongoing watershed restoration activities. There are beneficial effects predicted to the areas Scenic Resources and Botanical resources from increased management controls and reductions in road densities, along with streamside and forest restoration projects. There are beneficial cumulative effects to Prehistoric and Treaty Resources from avoidance of sites during planning, reducing unmanaged use, reducing erosion, and watershed restoration, weed control and forest management which reduce risk of losing treaty resources.

There are no predicted negative cumulative effects for wildlife species. Although there are minor indirect impacts to deer from the potential human disturbance associated with the development of non-motorized trails in areas where human disturbance is currently low, this disturbance is minimal and will not preclude use of the area by mule deer. Combined with other travel management actions in the area the project is expected to cumulatively benefit the mule deer population by reducing motorized roads, non-motorized trails, and cross country travel.

There are variety of cumulative effects to recreation values from the project in conjunction with other projects and trail developments in the past 10 years and implementation of the Travel Management Rule (Appendix 2, pg 23). We do predict a cumulative increase in use in the lower portion of the cumulative effects analysis area near the city of Sisters and the bottom 3 miles of the Whychus Creek Wild and Scenic River Scenic section. This is accompanied by the benefits of potentially reducing pressure on the Whychus Creek Wild and Scenic River Wild section and the Three Sisters Wilderness where use is too high.

The overwhelming trend in the cumulative effects analysis area is the change in the variety of available recreational experiences with an emphasis on more managed low impact, non-motorized recreation,

and a loss of motorized recreation opportunities. With the upcoming implementation of the changes to public access in the cumulative effects analysis area, there would be less motorized access by vehicles and off-road vehicles and more managed hiker, biking, and equestrian trails. The majority of the Scenic River Corridor (5.8 out of 8.8 miles) will remain unchanged and available for unmanaged recreation experiences.

Most of the cumulative effects to recreation will result in *less use* in the cumulative effects analysis area. These include:

- A cumulative loss of motorized access.
- A cumulative loss of motorized access for dispersed camping, especially along Whychus Creek.
- A cumulative loss of dispersed camping, especially along Whychus Creek.
- A cumulative reduction in user created motorized trails.
- Potential cumulative reduction of use in the upper portion of the cumulative effects analysis area on popular wilderness trails such as the Chush Falls Trail and Tam McArthur Rim Trail in the Whychus Creek Wild and Scenic River Wild Section.
- Potential cumulative beneficial effects to wilderness values and to the Wild Section of Whychus Creek Wild and Scenic River from increased opportunities in areas close to the City of Sisters.

LandWatch has premised a number of its comments allowing some recreation development in the area on the assumption that the Forest Service would not follow through on its proposed Alt 2. However, if the Forest Service pursues the Alt. 2 recreation development plan, then LandWatch must oppose the surrounding mountain bike trail development proposed in Alt 2, as well as the development of the lookout, on the basis of the negative cumulative effects of all of this recreation development. PD- 28

Response: The response above and Appendix 2 discuss the variety and scope of beneficial cumulative effects.

Wildlife

The map at page 15 of the EA does not show the true extent of the deer habitat in the area. An environmental analysis addressing impacts on wildlife should not just look at the river corridor but should address the broader Tumalo Deer Winter Range and surrounding Forest Service management of deer habitat. PD-9

Response: The map referred to on page 15 shows management direction in the project area and shows the Deschutes National Forest Management Allocations for the project area. This includes the Tumalo Winter Range which is discussed in the Wildlife section (EA, pg 149).

The Tumalo Winter Range overlaps the northern section of the project area, however in the Whychus Wild and Scenic River Management Plan we extended protections for deer habitat in the form of Wildlife Standards and Guidelines to protect deer habitat in the Wild and Scenic River corridor because we believe it is all used as summer/transition range as well.

Deer are managed by two agencies. The Forest Service manages deer habitat and the Oregon Department of Fish and Wildlife (ODFW) manages deer populations. The ODFW manages population based on designated hunt units. The project area occurs within the Upper Deschutes hunt unit. The

management objective for this hunt unit is 4300 animals. The area produces a harvestable excess of animals for hunting, and ODFW issued 2200 tags allowing animals to be killed. The EA (pg 151) discusses our conversation with Corey Heath of ODFW regarding deer migration in the project area. Mr. Heath did not express any concerns regarding the trail location or extent and discussed and concurred on the benefit that will come from road closures and change in users and activities (to low impact recreation) associated with the project area.

Conclusions that the trails won't "create a barrier to migration" and that "the disturbance to deer within their range would be negligible" fail to assess the actual impacts of this development in a canyon corridor that is recognized as a migration route. PD-18

Response: The location of the trails and project area were analyzed and ODFW was consulted to determine the effects of the project proposal on deer and deer habitat. By closing roads in the project area, reducing user created trails, allowing foot traffic only on the new trail system, all action alternatives would be beneficial to deer habitat within the area.

There is no identified migration route associated with the project area. As discussed above in the previous response we consulted with ODFW, and migration routes vary in the area from year to year. Mr. Heath (ODFW) did not feel that the project would cause a barrier to deer movement through the project area. Mr. Heath agreed that by creating a change to the user group, reducing the degradation of habitat from vandalism, and closing roads the overall disturbance to deer as they move through the project area would be reduced. The project would have beneficial effects to deer habitat, by reducing disturbance and reclaiming habitat impacted by dispersed recreation and roads.

The "Zone of Influence" analysis fails to acknowledge the impact of this proposed trail being in a canyon corridor. PD-17

Response: The "Zone of Influence" for the project was specifically designed for a canyon corridor as explained on EA pg 125/126. In determining a Zone of influence distance you take into account hiding cover as made possible by topography, vegetation, and other geographic features. It would be more difficult to obscure animals in a flat area, where a 200 foot distance might be needed. This is discussed on EA, pg 125/126.

Conclusions that the trails won't "create a barrier to migration" and that "the disturbance to deer within their range would be negligible" fail to assess the actual impacts of this development in a canyon corridor that is recognized as a migration route. PD-18

Response: The location of the trail and project area were analyzed and discussed with ODFW. See discussion above.

Wildlife- Inadequate Cumulative Effects

Wildlife habitat in the deer winter range is inadequately addressed where the cumulative effects of the recent fire in the area, all the thinning projects in the area and the existing recreation trail system in the area are not addressed. The conclusion at p. 151 that Alt 2 "would not cause any direct or indirect impacts and therefore there are no cumulative impacts to deer" (emphasis added) is without factual or logical foundation in the EA. PD- 21

Response: We examined this comment carefully. The conclusion of the wildlife analysis was that no adverse direct or indirect impacts would occur that would cause animals to leave the area, avoid the area, die, have a loss of viability, or that would leave habitat permanently unsuitable. Through consultation with ODFW, we concluded that the project was not expected to bisect any areas of migration. Action alternatives would be beneficial to deer use in the project area. Habitat would be enhanced rather than being further degraded (EA, pg 149-153 and Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011).

Although not discussed in the EA, there is a seasonal motorized closure area within the Tumalo Winter Range which is located east of Rd 16. This project proposes additional road closures which will contribute to the motorized restriction in the winter range, and in conjunction with upcoming foreseeable actions in the Forest-wide Travel Management Project, will cumulatively enhance habitat and limit motorized disturbance. The EA stated that no direct or indirect adverse impacts will occur to mule deer habitat as a result of the project (EA page 151 -152).

We amend that analysis here by clarifying that although there are no direct or indirect impacts to big game habitat both Alternative 2 and 3 will have minor indirect impacts to deer from the potential human disturbance associated with the development of non-motorized trails in areas where human disturbance is currently low. This disturbance is minimal due to the amount of hiding cover within the project area and will not preclude use of the area by mule deer. Deer are generalists and readily habituate to low levels of disturbance. Consultation with ODFW concluded that, based on the 17,000 acres of Tumalo Deer Winter Range, this project would not impact use, but could enhance habitat through the associated activities addressed under each action alternative (EA Pages 150-153). The Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011) has been corrected and amended.

Events such as the Rooster Rock Fire were briefly mentioned on pg 131. However, the wildfire was not harmful to deer habitat. Deer are a species which thrive on early seral habitats such as that created by much of the Rooster Rock Fire. Fires provide a short term abundance of highly palatable forage for deer populations. Thinning projects such as the Sisters Area Fuels Reduction (SAFR) promote development of early/mid/and late seral foraging habitat for deer habitat. All Deschutes National Forest and Whychus Creek Wild and Scenic River Management Plan standards for deer were met (EA, pg 18, 191-192).

The SAFR project enhanced approximately 5,600 acres of winter range, by thinning, mowing, and burning to create highly nutritious early seral forage conditions. This is a beneficial effect to the Tumalo winter range. Cumulatively the project will be beneficial to the overall Mule Deer population because of the reduction of open motorized roads and user trails in combination with implementation of the Travel Management Rule by the Travel Management Project on the Deschutes National Forest, Ochoco National Forest, and Crooked River National Grassland which would restrict motorized vehicle use to designated routes and be prohibit motorized access off designated routes.

Again, the Project Area is drawn too narrow for a proper cumulative effects analysis as shown by maps on deer habitat and trail systems in the area.

PD- 23

Response: The cumulative effects analysis area for mule deer is the Tumalo Winter Range (Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011). The EA

stated that no direct or indirect adverse impacts will occur to mule deer habitat as a result of the project (EA page 151 -152). As we discuss above, we amend that analysis here by clarifying that although there are no direct or indirect impacts to big game habitat both Alternative 2 and 3 will have minor indirect impacts to deer from the potential human disturbance associated with the development of non-motorized trails in areas where human disturbance is currently low. This disturbance is minimal due to the amount of hiding cover within the project area and will not preclude use of the area by mule deer. Deer are generalists and readily habituate to low levels of disturbance. Consultation with ODFW concluded that, based on the 17,000 acres of winter range, this project would not impact use, but could enhance habitat through the associated activities addressed under each action alternative (EA pg 149-153 and Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species (Gregg, M. 2011).

I also want to note an additional cumulative effects concern regarding deer, which is the Irrigation District project piping so much of the irrigation ditch. This piping will remove an important water source for deer in the area, leaving pretty much only the Creek itself PD-35

Response: Additional water sources are found immediately adjacent to the project area. These include the Runco and Lazy Z Ditch. Both water sources are unscreened and readily available to deer. In addition removing dispersed camping and evening use from much of the area will make Whychus Creek more accessible to deer.

Cultural Resources –Treaty Rights

The assessment of cultural resource use is primarily limited to “sites,” such as at pages 59 and 117 of the EA. A critical cultural use that is not adequately addressed is the deer habitat and deer migration corridors which the Tribes have identified as a cultural resource. Under the Treaty of 1855, the Tribes retained their usual and accustomed hunting rights. Treaty resources are not better protected by this plan, contrary to the statement at page 64, where the Tribes have clearly said they don’t want increased use in this area and want the deer wildlife habitat corridor protected (EA 121). PD-14

Response:

The EA includes consideration and analysis of Treaty Resources in the Cultural Resources Section under the heading “Traditional Use” (EA, pg 113-120) and in other sections of the EA which address water, fish, wildlife, and vegetation (EA, pg 78-106, 121-161). The reference above to EA, pg 59 is for a specific mitigation measure to avoid cultural prehistoric sites or work with an archeologist to develop site specific prescriptions where sites and restoration activities overlap.

Our assigned representative for off reservation projects at The Confederated Tribes of Warm Springs was consulted on this particular comment and participated in a field trip to the project area (Clay Penhollow, 2011, Personal Communication). We provided the above comments to him. We also discussed our consultation with ODFW and whether the Tumalo Deer Herd would be negatively affected or benefit from the project. ODFW has said it would be a benefit to reduce motorized access and roads and reduce user trail we explained some of the details of the wildlife analysis on "Zone of Influence" and how we determined the distance based on topography and vegetation.

Mr. Penhollow also consulted with Tribal Wildlife Biologist Doug Calvin regarding how much use the area gets by tribal members with tags issued by ODFW for deer. Mr. Penhollow said he felt we were

heading in the right direction. He said damage is occurring to many Tribal resources in the area (cultural sites, water, fish, and vegetation) from uncontrolled use, and that some issues rise to the top and you have to do something. He said he understood that we would designate a trail to limit effects to areas we want to protect and that when you designate a trail it has to be on a map. He said if we needed a letter of support he could provide it.

References

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USFS, 1990. Deschutes National Forest Land and Resource Management Plan. Deschutes National Forest, Supervisors Office, Bend, OR.

USFS, 1998. Sisters/Whyhus Watershed Analysis. Sisters Ranger District, Deschutes National Forest.

USFS 2009. Draft Environmental Impact Statement, Travel Management Project, Deschutes National Forest, Ochoco National Forest, and Crooked River National Grassland. Deschutes, Jefferson, Crook, Klamath, Lake, Grant and Wheeler Counties, Oregon.

USFS, 2010. Whyhus Creek Wild and Scenic River Management Plan. Sisters Ranger District, Deschutes National Forest.

USFS, 2010a. Whyhus Creek Wild and Scenic River Management Plan Environmental Assessment. Sisters Ranger District, Deschutes National Forest.

USFS. Recreation Opportunity Spectrum Class Definitions.
<http://www.fs.fed.us/r10/tongass/planning/ros.html>

Appendix 3

Whychus Portal Environmental Assessment Amended Recreation Cumulative Effects Analysis

By Maret Pajutee (District Ecologist) and Kirk Flannigan (Recreation Team Leader)

Past management has affected recreation in the cumulative effects analysis area (the upper Whychus and Three Creeks Watershed- from the headwaters to the City of Sisters) over the past 100 years. Actions considered include: timber harvest, grazing, fire suppression, wildfires, unmanaged recreation, housing developments and associated infrastructure, stream diversion, road closures, trail and road construction, and travel management. The scope of this analysis generally looks 10 years into the future.

Effects to visual quality

Vegetation Management- Timber harvest has removed the majority of large trees in accessible areas and fire suppression has caused forests to become more dense and sometimes diseased with mistletoe or insects outbreaks affecting visual quality and people's sense of place. Little vegetation management has occurred in the cumulative effects analysis area in the past 15 years. Foreseeable future actions in the next 5 years that may change visual quality and affect people's sense of place include: 1) Sisters Area Fuels Reduction Project (SAFR) approved in 2009 and in progress; 2) the Popper Vegetation Management Project, currently being planned, which would result in short-term scenic effects from cut trees, ground disturbance, smoke, blackened trees and ground for 1-3 years after burning. Long-term scenic quality would improve as open park-like stands and more natural historic stand conditions and wildlife habitat are restored; and 3) Invasive Plant Control on public lands through the Deschutes/Ochoco Invasive Plant program, which should benefit scenic quality by reducing large populations of invasive weeds along roads and waterways and allowing reestablishment of attractive native wildflowers and grasses.

Watershed Restoration, including road closures- -Some recent Forest Service streamside restoration activities within the cumulative effects analysis area have improved visual quality by reducing riparian trampling and devegetation, defining access and closing stream fords at 59 sites along Whychus Creek. Boulders appear somewhat natural but in other areas where they were not buried due to cultural site concerns or where numerous, they may appear negative to some viewers. Other watershed restoration projects such as the Three Sisters Irrigation Dam Fish Passage project have created both short term and long-term visual changes by reconnecting floodplains, armoring banks with large wood, and revegetating large streamside areas. Equipment associated with the dam, including the fish screen are unnatural appearing and will remain so, although there have been structures associated with the irrigation dam for almost 100 years. Streambanks will become more natural in appearance as vegetation grows. User trail restoration, road closures and road decommissioning throughout the watershed associated with vegetation management, watershed restoration, and this project, can appear unnatural in the short term but long-term scenic quality would improve as vegetation is reestablished and trail and roadbeds become less obvious.

Unmanaged Recreation and Vandalism- Unmanaged recreation and the effects of vandalism have affected people's experience by creating a less natural landscape with discordant elements such as

multiple trails, shooting damage, garbage, and injured trees and trampled vegetation. Road closures and conversion of unmanaged to managed trails systems (discussed below) have improved scenic quality by controlling access and restoring damaged areas.

These changes added to the possible future effects of this project, cumulatively improve the long term visual quality in the upper Whychus watershed.

Recreation Facilities and Public Access

Dispersed camping- Recent Forest Service streamside restoration activities within the cumulative effects analysis area have reduced streamside access for dispersed camping along Whychus Creek to better protect riparian areas along the creek from damaging use. The Whychus Creek Streamside Restoration Project reduced motorized access for dispersed camping by restricting and defining access and closing stream fords at 59 sites along Whychus Creek. The Three Sisters Irrigation District Piping project also has affected approximately 12 popular dispersed camping areas along irrigation ditches when the irrigation water was piped for water conservation purposes to return water to Whychus Creek. The lack of water and construction impacts have made these sites less desirable for camping. The implementation of the Travel Management Rule by the Travel Management Project on the Deschutes National Forest, Ochoco National Forest, and Crooked River National Grassland would restrict motorized vehicle use to designated routes and prohibit motorized access off designated routes on approximately 39% of the acres on the Deschutes including the cumulative effects analysis area. Motorized access for dispersed camping would be allowed only under general and special provisions when an open designated route is within 300 feet of a stream, wetland or waterbody.

These changes added to the possible future effects of this project, which would close 13 dispersed sites in the Wild and Scenic River Corridor result in a cumulative loss of dispersed riparian camping opportunities along Whychus Creek, including motorized access to dispersed camping. Campers will likely shift to other areas such as the dispersed campsites along Rd 1514 on Whychus Creek, Cold Springs, or creeks in the Metolius basin. Many of these areas have also been managed to prevent people driving and parking next to the creek, but camping is allowed.

Road access- Road densities, especially riparian road densities, in the cumulative effects area are high and exceed Deschutes National Forest Land and Resource Management Plan recommendations, varying from 9.2 mi/sq mile in the Melvin subwatershed to 2.2 mil/sq mile in the Three Creeks Lake Subwatershed (USFS 1998). Road closures associated with the Whychus Creek Streamside Restoration Project closed approximately 1.1 miles of system roads and an unknown number of user roads. The SAFR project does not close any system roads. Road closures are likely with the Popper Vegetation Management Project. In the near future Forest Service Managers plan to pull road access back from Chush Falls in the Three Sisters Wilderness to reduce use which has been growing and causing damage to the area. The implementation of the Travel Management Rule by the Travel Management Project on the Deschutes National Forest, Ochoco National Forest, and Crooked River National Grassland would restrict motorized vehicle use to designated routes and prohibit motorized access off designated routes on approximately 39% of the acres on the Deschutes including the cumulative effects analysis area. There is expected to be increased use on designated roads with more interaction and potential conflicts between different classes of motorized vehicles, especially on mixed use roads (roads which allow both ATV's and highway legal vehicles).

This would result in a change in users' ability to access the forest as they have in the past as motorized use would be limited to designated routes. Restricting access to designated roads and trails would primarily affect people who prefer a more primitive off-road recreation experience than designated roads and trails offer. This would also impact people who may depend upon a motor vehicle for access for hunting and gathering purposes.

These changes added to the possible future effects of this project, which would close 10.8 miles of system roads and 1.1 miles of user roads will cause a cumulative loss of motorized access in the upper Whychus watershed. This brings the area closer to Deschutes Forest Plan goals for road densities (2.5 mile/sq mile), however it makes the area, especially streamside areas, more difficult to access by vehicle for those who enjoy that experience.

Trails- Managed and User Created- In the past 10 years there has been increased growth and recreational interest in the Sisters area and a trend of changing from unmanaged recreational use and user created trails to managed recreational use, with the development of managed trail systems such as the Peterson Ridge Mountain Bike Trail and Sisters Community Trails. These trails attract and focus use into smaller areas, often using old roads as trailbeds. In some cases these trails attract events where hundreds of people occur for a short time.

User created hiking trails have also proliferated. In the upper reaches of the cumulative effects area in the Three Sisters Wilderness, users have created networks of trails near and above Chush Falls which is a short wilderness hike (1 mile). Users created trails around the Three Creeks Lake area, including the popular Tam McArthur Rim Trail are regularly closed by trail crews. User trails around Whychus Creek have also proliferated (5 miles of user trails in the project area). User created trails are often steep or poorly located, and receive no maintenance. As obstacles occur they tend to widen and braid, devegetating areas and creating confusion on where the route is located.

The increased management and visitor controls on managed trail systems can change people's experience. Many people prefer a managed experience where route finding is minimal and access is safer and less physically taxing. For others who prefer self discovery and solitude these changes detract from their experience, however, trail systems may focus use in certain areas, reducing use in other areas and leaving them more suitable for quiet self discovery. For instance, mountain bike use on the Metolius Windigo Trail and user trails along Whychus Creek has declined after the creation of the Peterson Ridge Mountain Bike Trail which provides a better experience for many riders. This also reduces conflicts with bikers and equestrians on the Metolius Windigo Trail.

Events on managed trails can negatively affect people's experience if they encounter large numbers of people where they expected solitude. Events are managed by special use permits and allowed in some areas of the watershed with restrictions on wilderness and Wild and Scenic River Corridor crossings. Others enjoy events as a social recreational experience and competition.

The development of trails in the Whychus Portal project area would combine with other managed trail systems to create a shift from unmanaged to managed recreational use and concentrate use on managed trails while removing user created trails. There would be a shift from shared use of user trails and roads by vehicles, bikes, horses, and hikers to more segregated use and horses, bikes, and vehicles would be excluded from some areas.

The development of motorized user trails will be prohibited with the implementation of the Travel Management Rule by the Travel Management Project on the Deschutes National Forest, Ochoco National Forest, and Crooked River National Grassland would prohibit motorized access off designated routes. There should be a cumulative reduction in user created motorized trails.

This project in combination with the other trails systems in the area would draw more use to the lower portion of the cumulative effects analysis area and the bottom 3 miles of the Whychus Creek Wild and Scenic River Scenic section. This may help reduce pressure and use on popular wilderness hikes such as the Chush Falls Trail and Tam McArthur Rim Trail in the Whychus Creek Wild and Scenic River Wild Section by providing other views and waterfalls closer to town to visit. This shift would be beneficial to wilderness values and to the Wild Section of Whychus Creek Wild and Scenic River.

Effects to Primitive Character

Primitive character is defined by the Recreational Opportunity Spectrum as: Opportunity for isolation from man-made sights, sounds, and management controls in an unmodified natural environment. Only facilities essential for resource protection are available. A high degree of challenge and risk are present. Visitors use outdoor skills and have minimal contact with other users or groups. Motorized use is prohibited.

The only part of the cumulative effects analysis area which is managed as “Primitive” under the Recreational Opportunity Spectrum is the Three Sisters Wilderness, however the term is used here to help define aspects of landscape character and recreational experience which make a place feel primitive.

The primitive character of the cumulative effects area has declined with growth and use, development, resource extraction, and area management in the past 100 years. Road development, timber harvest, grazing, housing developments and associated infrastructure, managed trails, and unmanaged recreational use and vandalism have all caused a decline in primitive character.

Actions discussed above such as watershed restoration, road closures and decommissioning, and user trail restoration also affect primitive character in the short term because they look unnatural for the first 1-10 years, however they will improve primitive character in the long term as stream function returns to a more natural condition, user trail and road beds become overgrown, and vegetation recovers and as access by motorized vehicles is limited.

In the next 10 years, the sense of remoteness in the cumulative effects analysis area is likely to continue to decline and social encounters increase as use and growth in the area continues. Managing access through road closures in this project and others in the planning stage such as the Popper project, in conjunction with continued watershed restoration efforts will help reduce vehicle access to Whychus Creek and some of its tributaries, decreasing man-made sights and sounds. System trail use is likely to increase throughout the cumulative effects analysis area on existing system trails and combined with the potential effects of this project will reduce primitive character in particularly on trails from Rd 900 to the City of Sisters. However, having trail system close to the city may reduce pressure on wilderness trails and the Wild section of Whychus Creek Wild and Scenic River Corridor and improve their primitive character.

Recreational Experience Quality

The variety of recreational experiences in the cumulative effects area will change in the next 10 years with an emphasis on more low impact, non-motorized recreation and a loss of motorized recreation opportunities. With the implementation of the changes to public access in the cumulative effects analysis area, there would be less motorized access by vehicles and off-road vehicles and more managed hiker, biking, and equestrian trails. The development of trails in the Whychus Portal project area would combine with other actions in the cumulative effects analysis area to create a shift from unmanaged to managed recreational use and concentrate use on managed trails and designated roads while removing user created hiking and motorized trails and prohibiting cross country motorized travel.

For those people that enjoy a more managed recreation experience there will be more specialized trails close to town that are easy to find and with safer access. Those who enjoy solitude and self discovery will benefit from cumulative changes in the analysis area which reduce motorized access off designated routes and from the restoration of impacted areas. Their enjoyment may be reduced where they find more people concentrated along trails in areas close to the city of Sisters. As more use is drawn to the lower Whychus Creek Wild and Scenic River Scenic section, and other trails close to town, this may help reduce pressure and use on popular wilderness hikes such as the Chush Falls Trail and Tam McArthur Rim Trail in the Whychus Creek Wild and Scenic River Wild Section by providing other views and waterfalls closer to town to visit. This shift in would be beneficial to the quality of the primitive wilderness experience in the Wild Section of Whychus Creek Wild and Scenic River and the Three Sisters Wilderness.

Use- Number of parties per day

Use in the cumulative effects analysis area is expected to continue to increase in the next 10 years with population growth. Public lands close to the city of Sisters and nearby subdivisions will continue to see use by residents and visitors for hiking, biking, off road vehicle use, dispersed camping, motorized travel, and driving for pleasure. The number of people residing in the forest may also increase. Use of developed trails in the area will increase with population growth, advertised events, and promotion of the area.

The number of parties encountered per day are estimated to be within social encounter estimates of the Recreation Opportunity Spectrum Classes 80% of the time within the cumulative effects analysis area outside of the wilderness. Most of the area outside of wilderness is classified as Roaded Modified, Roaded Natural or Semi-primitive Motorized where users would expect to meet a range from less than 20 other parties per day on trails and in dispersed areas during at least 80% of the primary use season and numerous other parties on roads to 10-15 parties per day. Maximum party size is generally 12-20 people. Larger party sizes may occur in the primary use season in limited locations.

Summer use in the Three Sisters Wilderness and Whychus Creek Wild and Scenic River- Wild Section is higher than Wilderness Recreation Opportunity Spectrum (WROS) standards and guidelines recommend. The popular Chush Falls Trail in the Wild Section of the Whychus Creek Wild and Scenic River is in a Pristine ROS but may receive 50-100 of hikers per day on busy weekends. In the wilderness it is expected that desired social encounter indicators of 7 parties per day in Primitive WROS and 1 party per day in Pristine WROS will continue to be exceeded. Maximum party size is 12 people. Actions such as education, media outreaches, outfitter and guide management, trail head/trail

management or the development of trails nearby or with similar attributes are some ways that may assist in reducing wilderness use in locations that exceed group encounter objectives.

Summary:

- Cumulative loss of motorized access
- Cumulative loss of motorized access for dispersed camping, especially along Whychus Creek.
- Cumulative loss of dispersed camping, especially along Whychus Creek.
- Cumulative reduction in user created motorized trails.
- Cumulative increase in managed and regulated use in the lower portion of the cumulative effects analysis area near the city of Sisters and the bottom 3 miles of the Whychus Creek Wild and Scenic River Scenic section (34% of the length of the Scenic Corridor).
- Potential cumulative reduction of use in the upper portion of the cumulative effects analysis area on popular wilderness trails such as the Chush Falls Trail and Tam McArthur Rim Trail in the Whychus Creek Wild and Scenic River Wild Section.
- Potential cumulative beneficial effects to wilderness values and to the Wild Section of Whychus Creek Wild and Scenic River from increased opportunities in areas close to the City of Sisters.
- Cumulative change in the variety of recreational experiences with an emphasis on more managed low impact, non-motorized recreation, and a loss of motorized recreation opportunities. With the implementation of the changes to public access in the cumulative effects analysis area, there would be less motorized access by vehicles and off-road vehicles and more managed hiker, biking, and equestrian trails.

Appendix 4
Whychus Portal Environmental Assessment

List of Respondents to 30 Day Public Comments

	Name	Organization	Date received	Format
1	Eric Sorenson (ES)	Central Oregon Rocks, Inc	3/25/2011	email
2	Eva Eagle (EE)	Public	3/28/2011	email
3	Eugene Trahern(ET)	Sisters Trails Alliance	4/4/2011	email
4	John Schubert (JS)	Public	4/14/11	email
5	Paul Dewey (PD)	Central Oregon Land Watch	4/21/11	Letter and additional e-mail